

Illinois Environmental Protection Agency  
Division of Land Pollution Control

# RCRA INSPECTION REPORT

USEPA #: IL D 0 0 6 2 7 1 6 9 6	IEPA #: 1 1 9 0 2 0 0 0 2
Facility Name: Olin Corporation - Main Plant	Phone #: 618/258-2000
Street Address: 427 N. Shamrock Street	County: Madison
City: East Alton	State: IL Zip: 62024-1197
Region: Collinsville	Inspection Date: 08 / 17 / 95 From: 9:00 a.m. To: 12:00 n
Weather: Hot Approximately 95°	

US EPA RECORDS CENTER REGION 5



<b>TYPE OF FACILITY</b>	
Notified As: G/T/TSD	Regulated As: G/T/TSD
LDF? Yes HPV? No (Yes or No)	90-Day F/U Required?: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

<b>TYPE OF INSPECTION</b>	
CEI: <input checked="" type="checkbox"/> Sampling: <input type="checkbox"/> Citizen Complaint: <input type="checkbox"/> Closed: <input type="checkbox"/> Other: MMI	
CME/O&M: <input type="checkbox"/> Record Review: <input type="checkbox"/> Follow-Up to Inspection of: <input type="checkbox"/> Withdrawal: <input type="checkbox"/>	

<b>NON-REGULATED STATUS</b>	
SQG: <input type="checkbox"/> Claimed Nonhandler: <input type="checkbox"/> Other (Specify in Narrative): <input type="checkbox"/>	

<b>PART A</b>	
Notification Date: 08 / 18 / 80, from (initial) or (subsequent) Notification.	
Initial Part A Date: 11 / 18 / 80	Amended: 03 / 21 / 94
Part A Withdrawal requested: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	Approved by (US)(IL) EPA: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>

<b>PART B PERMIT APPLICATION</b>	
Part B Permit Submitted: Y or N 02 / 21 / 94	Final Permit Issued: 04 / 02 / 90

<b>ENFORCEMENT</b>	
Site 4-2(a) Only	
Has the firm been referred to -- USEPA: Y or N <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	
Illinois Attorney General: Y or N <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/> County State's Attorney: Y or N <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	

<b>ORDERS ISSUED</b>	
CACO: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/> CAFO: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/> Consent Decree: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	
Federal Court Order: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/> State Court Order: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/> IPCB Order: <input type="checkbox"/> / <input type="checkbox"/> / <input type="checkbox"/>	

## TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report		
							1991	19 92	19 93
S01	Yes	N/A	Yes	No	Yes	No	Yes	Yes	Yes
T03	Yes	N/A	Yes	No	Yes	No	Yes	Yes	Yes
S04	No	N/A	Yes	No	Yes	No	Yes	Yes	Yes
S03	No	N/A	Yes	No	No	No	Not Used Since 81-82		
T01	No	N/A	Yes	No	Yes	Some exempt per 725.101(c)(10)	Yes	Yes	Yes

**OWNER**

# OPERATOR

Name	Olin Corporation	Name	
Address	427 North Shamrock Street	Address	
City	East Alton	City	
State	Illinois	State	
Zip	62024-1197	Zip	
Phone #	618/258-2000	Phone #	

**PERSON(S) INTERVIEWED**

**TITLE**

**PHONE #**

	NAME	PHONE #
Bob Mooshegian	Sr. Assist. Env. Eng.	618/258-5050
Getchen Bohannon	Environmental Eng.	618/258-5551
Ken Talley	Site Supervisor	618/258-2000
Web Simms	Site Supervisor	618/258-2000
Roger Goodman	Site Supervisor	618/258-2000

**INSPECTION PARTICIPANT(S)**

**AGENCY/TITLE**

**PHONE #**

Chris Cahnovsky	IEPA/EPS III	618/346-5120
Doug Hayward	IEPA/EPS II	618/346-5120
Mike Grant	IEPA/EPS IV	618/346-5120
Mark Moloney	USEPA/Env. Eng.	216/835-5200

**PREPARED BY**

**AGENCY/TITLE**

**PHONE #**

	AGENCY/TITLE	PHONE #
Chris Cahnovsky	IEPA/EPS III	618/346-5120

## SUMMARY OF APPARENT VIOLATIONS

[illegible][illegible][illegible]

## NARRATIVE

1190200002 - Madison County  
Olin Corp. Main Plant  
Prepared by: Chris Cahnovsky  
Dates of Inspection: August 15, 16 and 17, 1995

On the dates of August 15, 16, and 17, 1995, a Compliance Evaluation Inspection was conducted at Olin Corporation's Main Plant in East Alton, Illinois. This inspection was conducted as part of a Multi-Media Inspection involving the Illinois Environmental Protection Agency (IEPA) and the United States Environmental Protection Agency.

Two manufacturing plants make up Olin Corporation's (Olin) Main Plant Facility. One plant is operated by the Brass Division and the other is operated by the Winchester Division. The Brass Division manufactures copper-base alloy strip and fabricated products; the Winchester Division manufactures small arms ammunition, ammunition components, and explosives.

Olin was issued a RCRA Part B Permit for the storage of mercury contaminated ammunition and debris at Site 4-2(a) (S01). This permit was issued on April 2, 1990, with an effective date of May 5, 1990. In March 1994, Olin submitted a new RCRA Part B Permit Application for Site 4-2(a), the Zone 3 incinerators (T03) and the Zone 6 wastewater lagoon (S04). Olin also, has several under 90-day container areas and an under 90-day treatment tank.

Through Olin's manufacturing operations, several hazardous wastestreams are generated. These wastestreams include wastewater treatment sludge (F006, K046 and D008), plating waste (D008 and D003), spent solvent (F002, F003, D001, D007, D008 and D029), mercury contaminate debris (D009 and D008), lead contaminated filters and oily waste (D008), explosive wastes (D001, D002 and D003), refractory brick (D008) and lead contaminated waste wax (D008). The significant nonhazardous wastes generated by Olin include treated incinerator ash, treated tumbling media, wastewater treatment sludge and used oil.

A review of Olin's manifests, waste analysis, waste analysis plan, training records, contingency plan, operating records and inspection records was conducted. The training records, operating records, inspection records and relevant parts of the contingency plan are kept at each Site by the Site Supervisors. The manifest number on the Land Disposal Restriction Notification Form attached to manifest 00557107 was missing. Mr. Mooshegian corrected this discrepancy before the end of the inspection, so no further action is required.

During the plant inspection, the following Sites were observed:

#### ZONE 1

The Bullet Plating Facility has four under 90-day hazardous waste accumulation points. This facility consists of electroplating operations where steel and lead components of small arms ammunition are copper plated. Wastewater from the plating operation is treated in the Cyanide Destruct Tank and associated sump. These units discharge to the Winchester Wastewater Treatment Facility (WWTF) and are covered in the facility's NPDES permit.

Solid material such as metal, wood and plastic that become contaminated with cyanide are treated in the Cyanide Decontamination Tank. This tank is a 230-gallon metal tank at the end of the plating line. The Cyanide Decontamination Tank has adequate secondary containment. Sodium hypochlorite is used to decontaminate the cyanide contaminated scrap. The scrap is covered with sodium hypochlorite until no free cyanide is detected in laboratory analysis of samples of the solid material. The treatment residue is discharged to the Cyanide Destruct Unit for treatment. Per the material safety data sheet (MSDS), sodium hypochlorite has a pH of 12.95 at 11% NaOCl. Apparently, the sodium hypochlorite has caused severe corrosion of the Cyanide Decontamination Tank. I observed that this tank was severely corroded. The corrosion was causing the paint to peel off the outside surface of the tank. Pursuant to 35 Ill. Adm. Code 725.294(a), treatment reagents must not be added to a tank that could cause the tank to corrode. Therefore, the apparent violation of 722.134(a), specifically 725.294 is being alleged.

Cyanide waste that cannot be treated is accumulated in 55-gallon drums. These drums are accumulated on the waste cyanide storage pad. This pad is 140-square feet and can hold up to 32 fifty-five-gallon drums. During this inspection, I observed one drum of cyanide contaminated waste. This drum was properly labeled and dated.

Spent solvents are generated in Zone 1 from the waterproofing of ammunition primers. These solvents are accumulated at the Analytical Lab Spent Solvent Accumulation Point (Site 1-9) located on the southeast corner of Building 473. This site is an under 90-day hazardous waste accumulation area. One 55-gallon drum of chlorinated solvent and three 55-gallon drums of non-chlorinated solvent were present at Site 1-9. These drums were properly labeled, dated and closed.



A 2-yd<sup>3</sup> metal is container used to accumulate lead contaminated oily waste at the shot tower. Lead contaminated oily waste is generated from cleanup activities at the Shot Tower. This container was properly labeled, dated and closed. The waste wax from the bullet lubricator at the Shot Tower is handled as a hazardous waste (D008). Olin has just recently segregated this waste from the rest of the facility's waste wax. This waste wax will be satellite accumulated at the Shot Tower and then sent to the Material Reclamation Facility (MRF) for 90-day accumulation.

Olin's Zone 1 generates large amounts of used oil. Used oil generated at the Brass Mill is reclaimed on-site by two separation and filtration units. These units are located in the Brass Mill Oil Processing Area, north of the Number 18 Mill. The reclaimed oil is reused in the Brass Mill. The tanks used to transport used oil to the reclaim facility and the facility's processes tanks were properly labeled. Used oil is also accumulated in a 12,000- gallon tank on the south side of the Brass Mill. This tank was properly labeled. Used soluble oil is generated at the Fab Shop. This oil is stored in six 500-gallon tanks in back of the shop. The words "Used Oil" were painted on the side of each tank, however, the paint was worn and hard to read.

The waste analysis for the soluble used oil generated at the Fab shop showed a total halogen content of 4,310 mg/l. Used oil that contains over 1,000 ppm total halogens is considered a hazardous waste. Olin has made a rebuttable presumption for this used oil. Olin rebuts this presumption by showing that the product that is causing the high total halogen content is Franklin Tuf-Draw 1919. According to the MSDS and the manufacturer, Franklin Tuf-Draw 1919 contains chlorinated paraffins and does not contain any EPA listed halogenated hazardous wastes. Therefore, the Fab shop used oil is not a hazardous waste.

Since January 1994, Olin has been treating spent tumbling media with super triple phosphate in an under 90-day treatment unit. Before treatment, spent tumbling media is characteristically hazardous for lead (D008). The purpose of this treatment is to render the spent media nonhazardous for lead. Olin submitted a waste analysis plan pursuant to 728.107(a)(4) on September 23, 1993. The two treatment areas are at Building 244 (Site 1-19) and Building T-500 (Site 4-10 - Zone 4). Both treatment processes have been added to the facility's contingency plan and training records. Inspections of the treatment areas are being conducted weekly. The Building 7 treatment area was moved to Building 244.

## ZONE 6

Olin operates two wastewater treatment facilities (WWTF) at Zone 6. The Zone 6 WWTF handles non-contact wastewater and stormwater from Zone 1 via combined sewers. The sludge generated from the Zone 6 WWTF is nonhazardous. The Winchester WWTF is designed to handle and treat up to 158,000 gallons of hazardous wastewater per day. Hazardous sludge (F006, K046 and D008), from the Winchester WWTF, is accumulated in 15 cubic-yard roll-off containers. At the time of this inspection, approximately 25 cubic yards of sludge were observed. All roll-off boxes were under 90 days. Olin is currently using baghouse dust generated from the Zone 3 incinerator at the WWTF's to raise the pH of the influent from 1.8 to 6.5.

The Zone 6 Emergency Holding Lagoon no longer stores hazardous waste. Olin has included this unit in their March 21, 1994 Part B Permit application as a surface impoundment that will only handle nonhazardous wastewater. Olin filed for an Adjusted Standard with the Illinois Pollution Control Board. The Adjusted Standard was granted by the IPCB on February 27, 1992, and allows Olin to keep open and continue to use the Lagoon, for nonhazardous waste until the year 2039. The facility continues doing daily inspections and employee training as it relates to the lagoon.

## ZONE 4

The Centerfire tumbling media is treated in Building T-500 (Site 4-10) in an under 90-day treatment unit. This unit is operated the same as the treatment area located in Building 244 in Zone 1. Olin operates an oil reclamation process at Zone 4. This process is located in Building T-400. The used oil collected from pits located under the Shot Shell machinery is directed to an inground tank in Building T-400. The oil from this inground tank goes through a series of separators and filters used to clean the oil. Once cleaned, the oil is returned to the Shot Shell process for reuse. Good housekeeping practices are being conducted at Building T-400.

Zone 4 is the site of the Material Reclamation Facility (MRF), Site 4-2(a). The MRF is a three acre site used for the storage of hazardous wastes. Also, the Site includes a Part B permitted storage building (S01) for the storage of mercury contaminated debris and ammunition.

The MRF consists of five regulated areas:

- 1) Fenced Storage Area - This area is currently going through closure. No waste has been placed in this area since January 17, 1992.
- 2) The Spent Solvent Storage Area is currently undergoing closure and is now used as a 90-day accumulation point. This area receives spent solvent from several Zones. Two drums of chlorinated solvent and two drums of non-chlorinated solvent were observed in this area. One drum of non-chlorinated solvent did not have an accumulation start date on the label. Per Site Supervisor Ken Talley, two drums of non-chlorinated solvent were received at the MRF with out-of-dated DOT descriptions on them. When he put new labels on the drums, he inadvertently left the date off the label on one drum. These two drums were originally dated August 7, 1995. Mr. Talley immediately put the date on the label.
- 3) Two 40-foot semi-trailers are used to accumulate lead contaminated waste. One drum of Lead Contaminated Waste Wax was observed in this area. This drum was properly labeled and dated.
- 4) A building has been constructed at this site to store mercury contaminated ammunition and debris (S01). It was put into service on September 26, 1991. Olin has a Part B permit for the storage of hazardous waste in this building. At the time of this inspection, six boxes of mercury contaminated debris were observed in this building. One box was dated September 22, 1994. This box is approaching one year in storage (728.150).
- 5) The Powder House is the site where smokeless powder in water, primer mix scrap and nitrocellulose scrap are collected and repacked for transportation and treatment at the Zone 3 incinerator. Twenty-seven four-gallon buckets of smokeless powder in water and 12 four-gallon buckets of primer mix scrap were observed in this building. These containers were properly labeled and closed. This area was very clean and free from clutter.

### Zone 3

Olin is attempting to obtain a Part B permit for two hazardous waste incinerators located in Zone 3, Site 3-1. Olin is currently burning hazardous waste under interim status. The Zone 3 incinerators are being operated to burn the following explosives containing hazardous wastes: Primer Mix Scrap - Class A Explosives (D002 and D003), Smokeless Powder Scrap - Class B Explosive (D003) and Nitrocellulose Scrap - Ignitable Waste (D003). Since January 1995, Olin has burned 209,210 pounds of hazardous waste. These wastes are being accumulated in four gallon water filled pails and are stored in a specially designed room. All pails were properly labeled and dated. Thirty-three 4-gallon buckets of smokeless powder in water and eight 4-gallon buckets of primer mix scrap were observed in this building. These containers were properly labeled and closed. Besides these hazardous wastes, the facility is also incinerating combustible factory trash. This is the primary purpose of the two incinerators that generate steam through two-heat boilers.

The waste feed system consists of a ram feeder, which feeds factory waste to the lower chamber of both incinerators. When explosive wastes are fed, they are manually placed in the ram feed with the factory trash. During this inspection, no explosive wastes were being fed into the incinerator. I observed the ash rams on Incinerators 1 and 2. The ash ram unit pushes the ash from the lower chamber into a sealed breaching duct at the rear of the lower chamber. These materials fall from this breaching duct into an ash receiving tank. Ash and solids are continuously removed from the ash receiving tank by a chain drag conveyor and discharged into one-cubic-yard boxes for treatment. As the ash ram returns to its original position, it drags ash out of the front of the lower chamber. This ash is then deposited in enclosed ash door boxes. This prevents the ash from accumulating on the floor. Good housekeeping practices are being conducted at Zone 3.

Since May 1992, Olin has been treating their incinerator ash with super triple phosphate to render it nonhazardous per TCLP. Before treatment, Zone 3 incinerator ash is characteristically hazardous for lead (D008) and cadmium (D006). Super triple phosphate binds the lead and cadmium. This waste is then sent to the Litchfield-Hillsboro Landfill as a nonhazardous waste. A waste analysis plan was submitted to the Agency for this under 90-day treatment.

As a result of this inspection, the apparent violation of 722.134(a), specifically 725.294 was observed.

CNC\OLIN10.MMI

Facility Name: Olin Corp Main Plant  
 USEPA #: IL D006271696

IEPA #: 1120200002

# WASTE DISPOSITION

## FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On Annual Report for: (Circle if present; cross out if not present)				Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
				* On 8700-12	* On 3510-3	* 19	* 19				
WWT <sup>P</sup> Sludge	Winchester Plant	11/1/93	FC06 K046 DEC8	YES	N/A	(G)	(G)	(G)	362,225 #s in 1994	6/16/95	Enycle Corpus Christi, TX.
Plating tank Filters & Dangers	Bullet Plating Facility Site 1-1	8/29/94	DEC8 DEC3	YES	N/A	(G)	(G)	(G)	2736 #s in 1994	4/6/95	Pyancokem Detroit, MI.
Spend Solvents	Cleaning, cutting, degreasing, water proofing	12/22/93	FC02 FC03 DEC1 DEC5	YES	N/A	(G)	(G)	(G)	53 gal. 535 gal. in 1994	7/24/95	Safety-Kleen
Mercury Cont. Debris	Lab waste from Ammo testing	8/5/93	DEC8 DEC9	YES	YES	(G)	(G)	(G)	81 gal in 1994	2/22/94	Olin Chemicals Charleston, TN.
Lead Contaminated Filters	Turn around at the shot tower	10/4/94	DEC8 DEC4	YES	N/A	(G)	(G)	(G)	7 yds in 1994	7/25/95	Zone 3 and off-site to Eucum Emelle, AL.
Lead Contaminated Oil Waste	Clean-up around equip. at the shot tower	6/2/93	DEC8	YES	N/A	(G)	(G)	(G)	2 yds in 1994	5/31/95	Heritage Env. Indianapolis, Ind.
Primer, Spangor & Rays	Ammunition mfg in Zone 1 & 4	5/2/94	DEC1 DEC2 DEC3	YES	YES	(G)	(G)	(G)	100,520 #s in 1994	8/10/95	Zone 3 Incinerator
Powder in water	"	5/2/94	DEC3	YES	YES	(G)	(G)	(G)	340 gal in 1994	8/11/95	"
Nitrocellulose Scrap	"	5/2/94	DEC3	YES	YES	(G)	(G)	(G)	3,300 #s in 1994	N.D.	"
Refinery Brick	Shot tower	4/30/95	DEC8	YES	N/A	(G)	(G)	(G)	90 gal in 1995	7/25/95	Eucum Emelle, AL.

\* All "NO" responses must be explained in narrative.



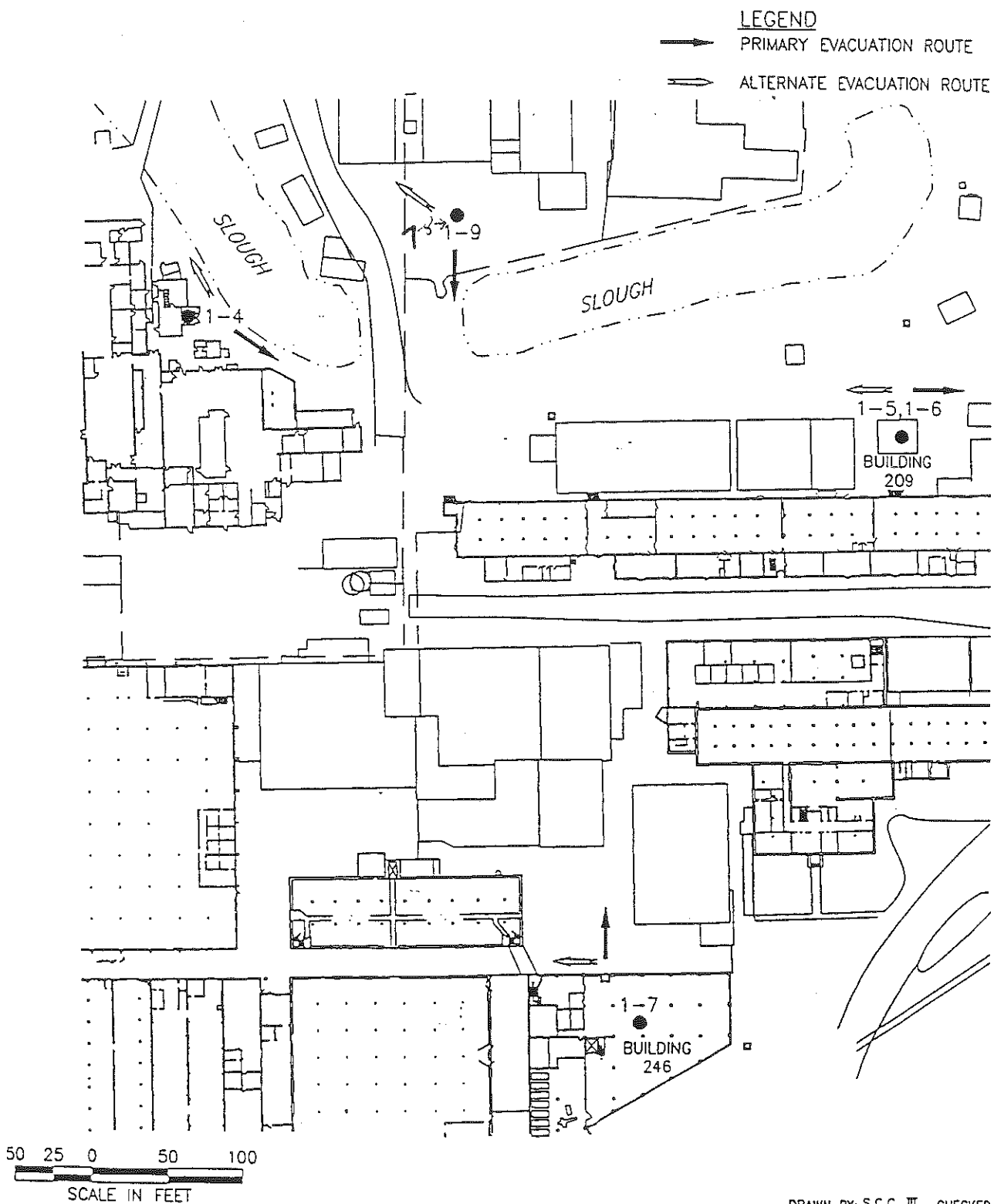
Facility Name: Olin Corp Main Plant  
 USEPA #: IL 0006271696  
 IEPA #: 1190200002

# WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition		
				* On 8700-12	* On 3510-3	* 19						
Lead Contaminated waste wax	Bulk Lubrication at the Shot Tower	2/2/94	D008	yes	N/A	G	G	G	55 gal	~550 gal in 1995	2/10/95	TLWI - Sauget, IL
Filter Sand	WWTP Winchester	10/3/94	F006 K046	yes	N/A	G	G	G	-0-	10 yd <sup>3</sup> in 1994	10/25/94	PDC
						G	G	G				
						F	F	F				
Incinerator Ash	Zone 3 Incinerator	5/24/95	NH	N/A	N/A	G	G	G	45 yd <sup>3</sup>	2,852,007 #s in 1994	7/26/95	Litchfield-Hillsboro Landfill
						F	F	F				
Tumbling media	Zone 1 & Zone 4 Treatment Areas	1/23/95	NH	N/A	N/A	G	G	G	~2 yd <sup>3</sup>	318,038 #s in 1994	7/21/95	"
						F	F	F				
WWTP sludge	Zone 6 plant	10/20/93	NH	N/A	N/A	G	G	G	-0-	~40 yd <sup>3</sup> per day	7/17/95	"
						F	F	F				
Waste oil	Zone 1		NH	N/A	N/A	G	G	G	~11,000 gal	~20,000 gal per month	8/9/95	Gateway Petroleum East St. Louis
						F	F	F				
						G	G	G				
						F	F	F				
						G	G	G				
						F	F	F				

\* All "NO" responses must be explained in narrative.

SOURCE:  
Base Map Provided By OLIN



DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMUs 1-4, 1-5, 1-6, 1-7, 1-9

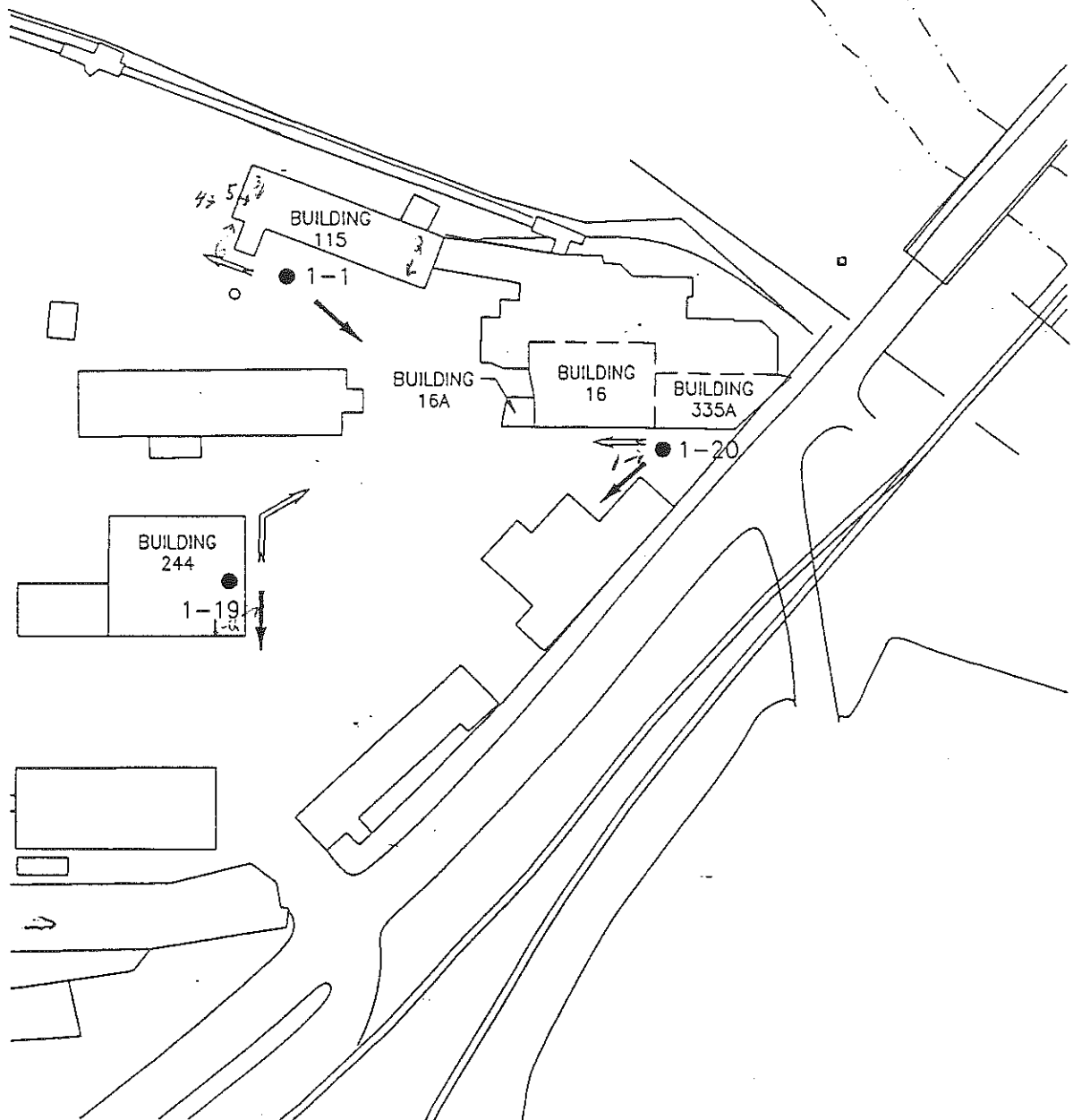
AUGUST 1995

FIGURE 5

SOURCE:  
Base Map Provided By OLIN

**LEGEND**

- PRIMARY EVACUATION ROUTE
- ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMUs 1-1, 1-19, 1-20

AUGUST 1995

FIGURE 9

SOURCE:  
Base Map Provided By OLIN

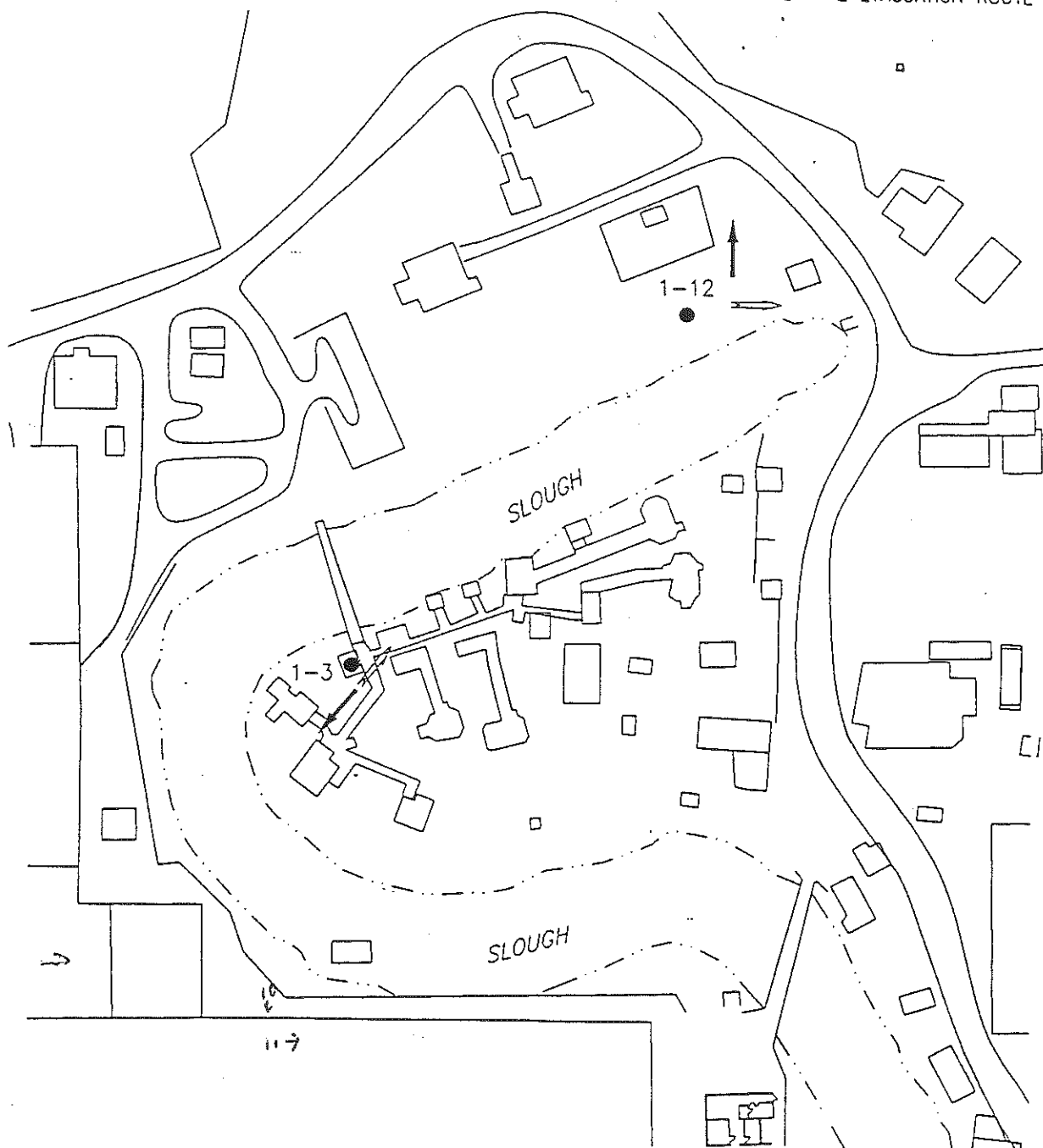
**LEGEND**



PRIMARY EVACUATION ROUTE



ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMUs 1-3, 1-12

AUGUST 1995

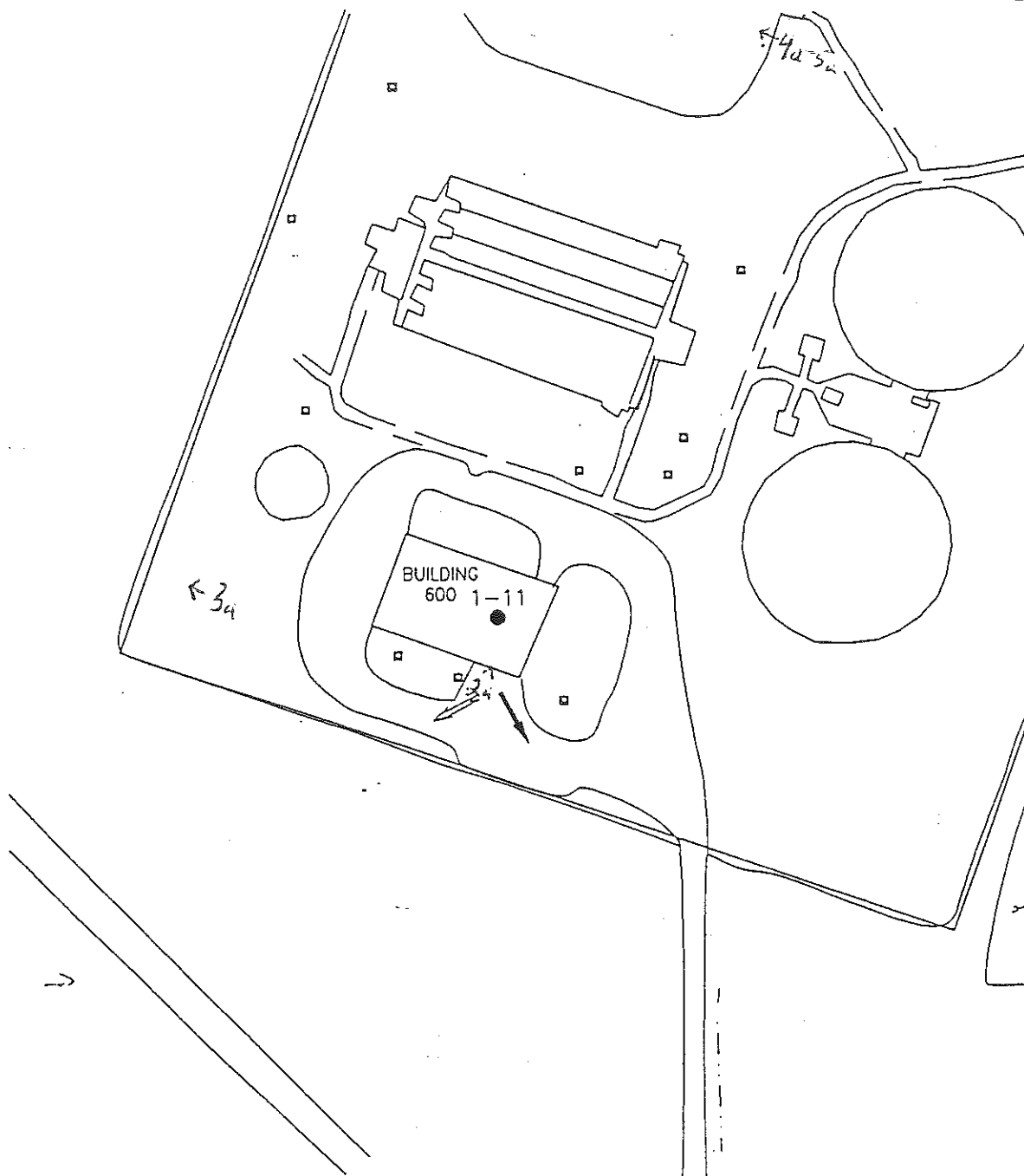
FIGURE 8

45519 \ 95-0134/08-10

SOURCE:  
Base Map Provided By OLIN

**LEGEND**  
→ PRIMARY EVACUATION ROUTE  
⇨ ALTERNATE EVACUATION ROUTE

N



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



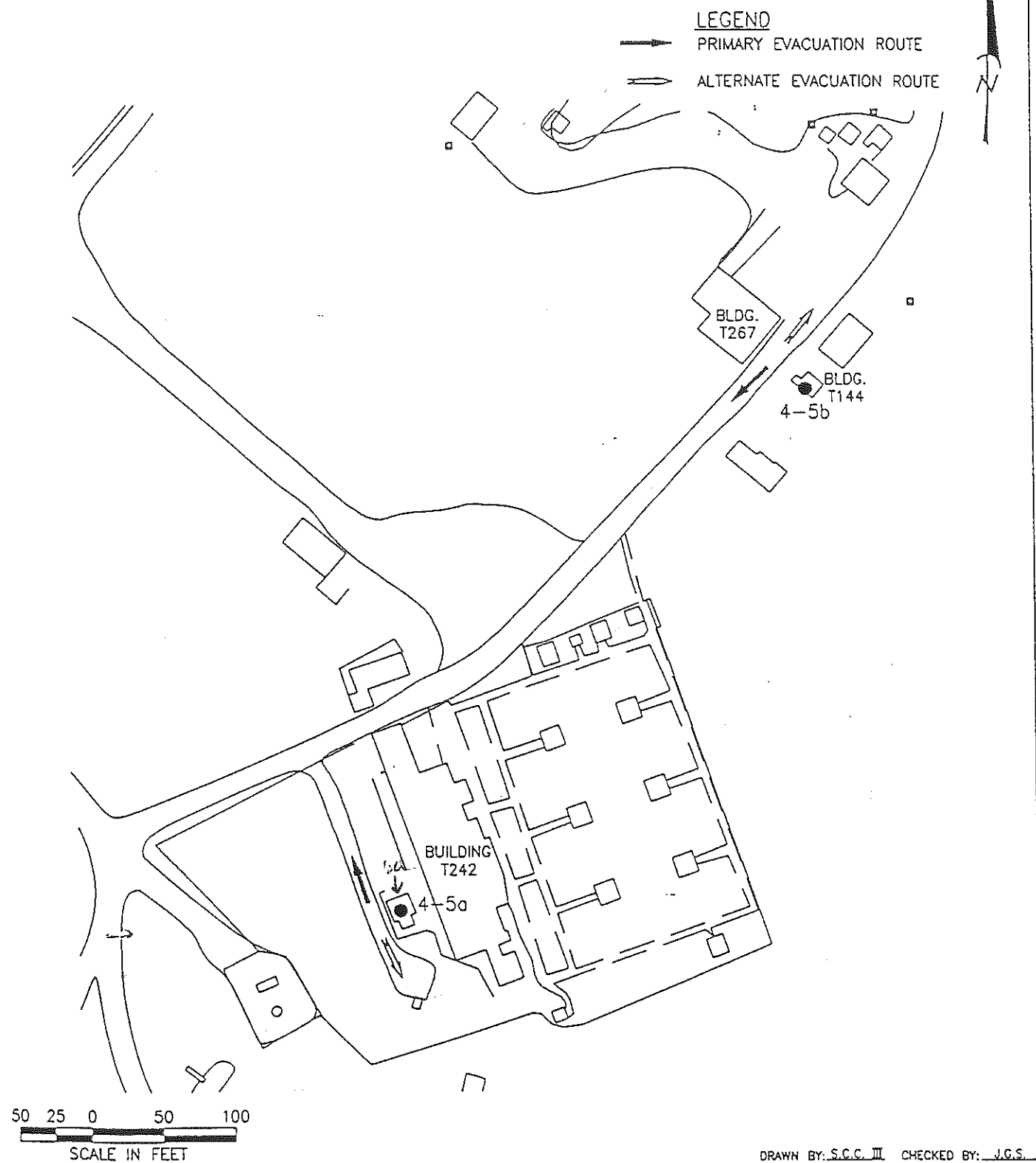
GENERAL EVACUATION PLAN FOR  
HWMU 1-11

AUGUST 1995

FIGURE 7



SOURCE:  
Base Map Provided By OLIN



Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMUs 4-5a, 4-5b

AUGUST 1995

FIGURE 13

SOURCE:  
Base Map Provided By OLIN

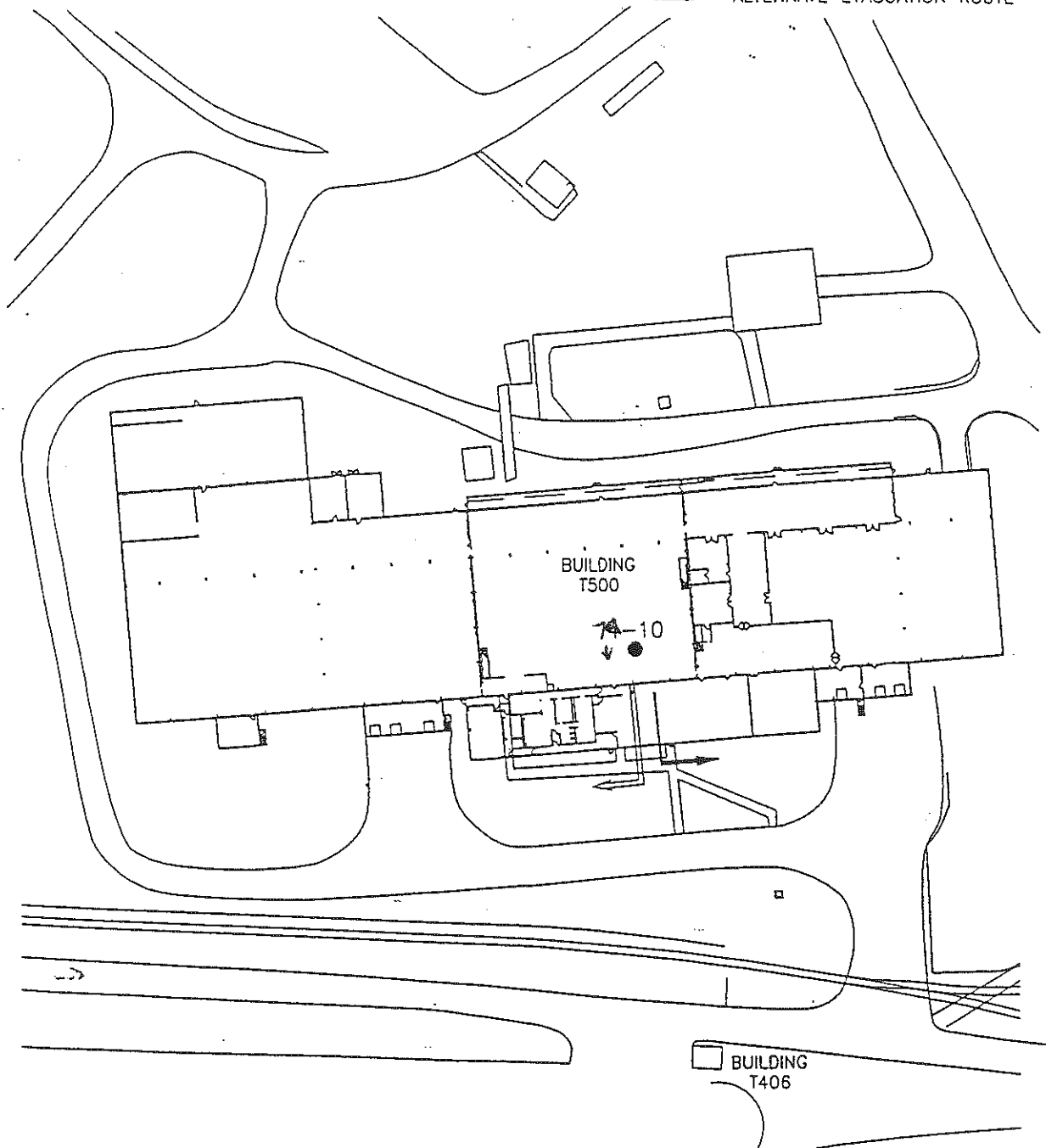
LEGEND



PRIMARY EVACUATION ROUTE



ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMU 4-10

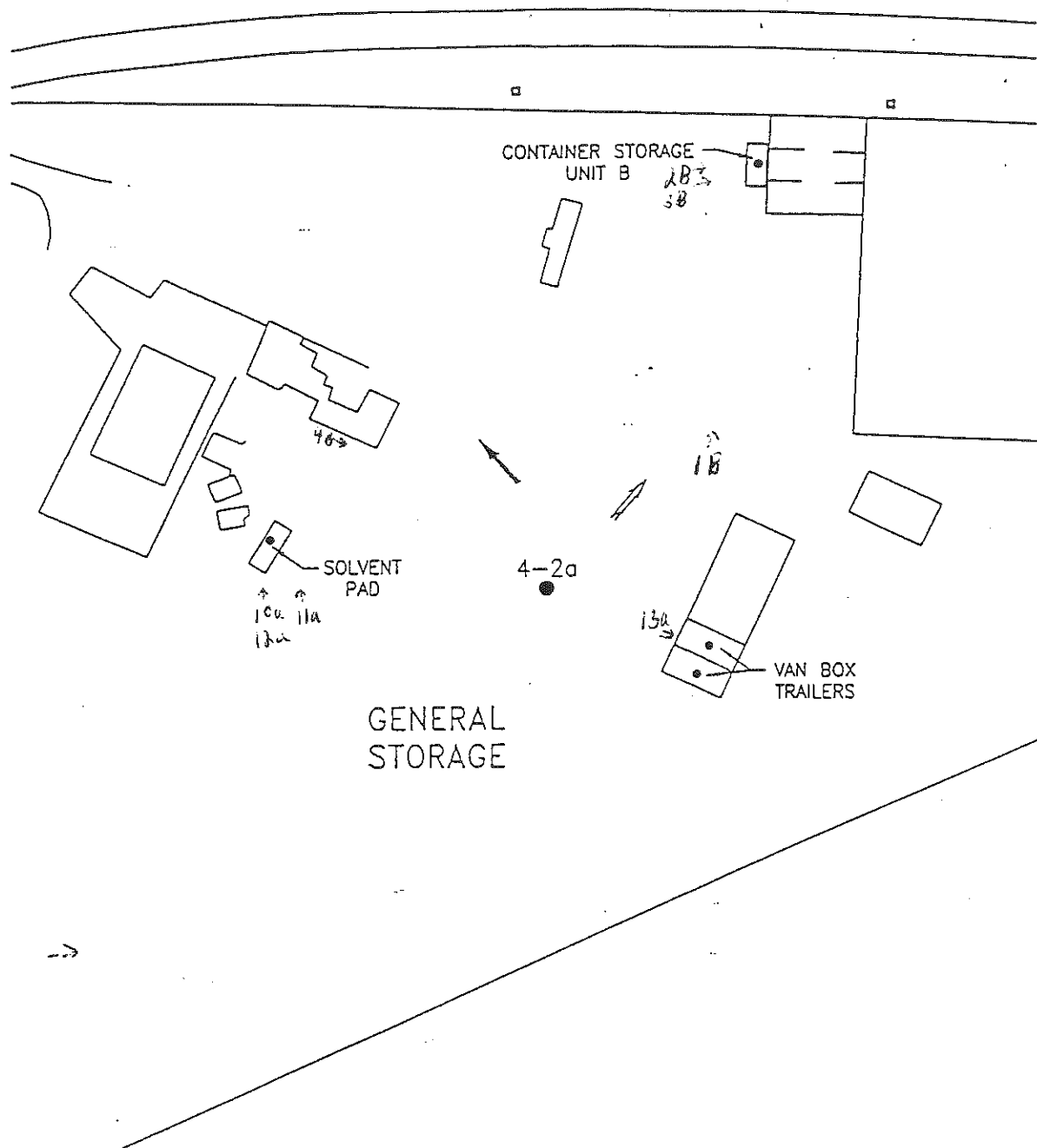
AUGUST 1995

FIGURE 14

SOURCE:  
Base Map Provided By OLIN

# LEGEND

- PRIMARY EVACUATION ROUTE
- ⇨ ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMU 4-2a

AUGUST 1995

FIGURE 11

SOURCE:  
Base Map Provided By OLIN

LEGEND

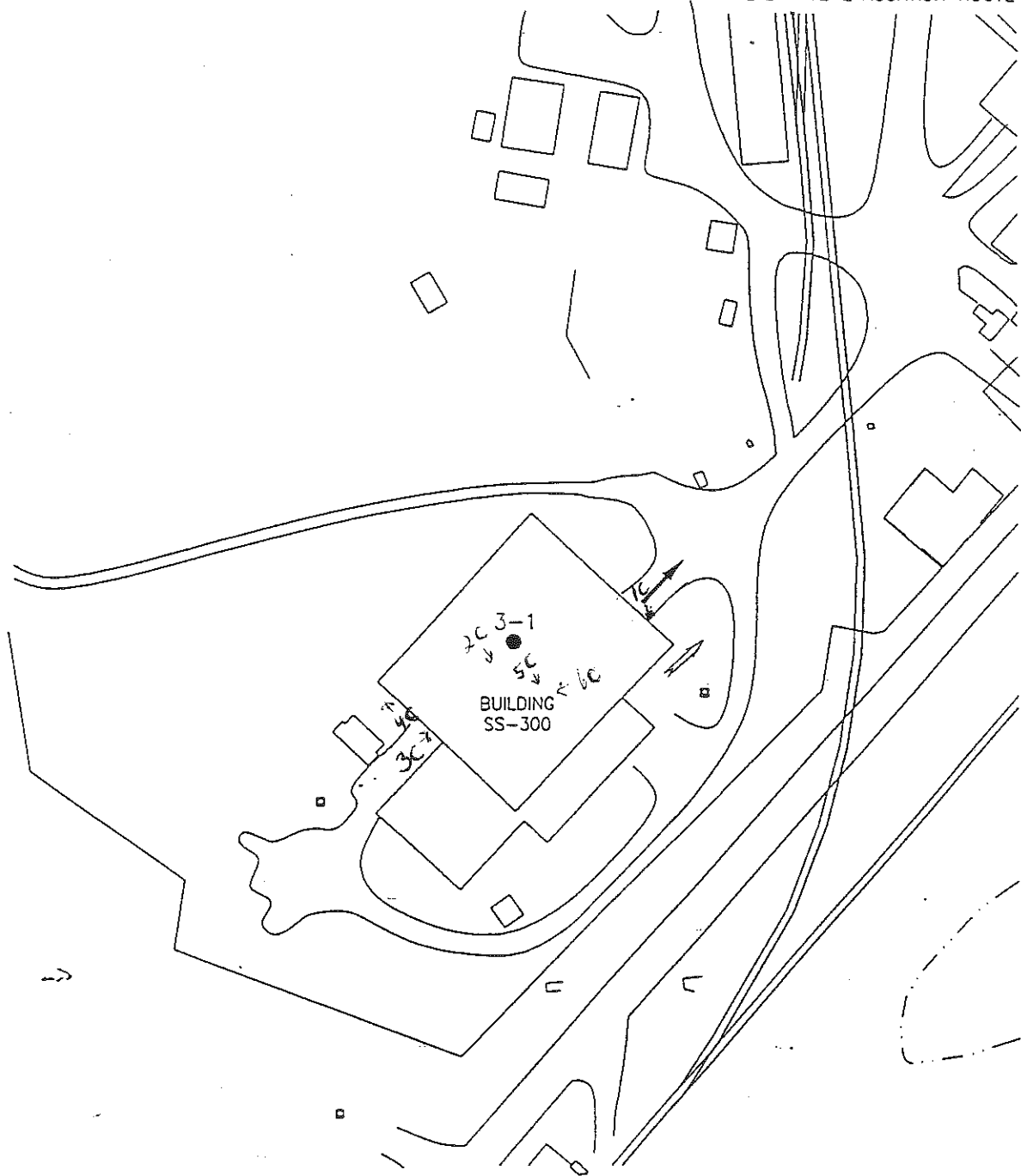


PRIMARY EVACUATION ROUTE



ALTERNATE EVACUATION ROUTE

N



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMU 3-1

AUGUST 1995

FIGURE 10

DATE: AUGUST 15, 1995  
TIME: 9:15 - 3:30  
D. 1190200002  
MADISON County  
OLIN CORP./MAIN PLANT  
PHOTOGRAPH TAKEN TOWARD THE:  
NORTHEAST  
ROLL# 2635 PHOTO# 1  
PHOTOGRAPH BY:  
*Ch. C. C. C.*



DATE: AUGUST 15, 1995  
TIME: 9:15 - 3:30  
D. 1190200002  
MADISON County  
OLIN CORP./MAIN PLANT  
PHOTOGRAPH TAKEN TOWARD THE:  
SOUTHWEST  
ROLL# 2635 PHOTO# 2  
PHOTOGRAPH BY:  
*Ch. C. C. C.*





DATE: AUGUST 15, 1995

TIME: 9:15 - 3:30

I.D. 1190200002

MADISON County

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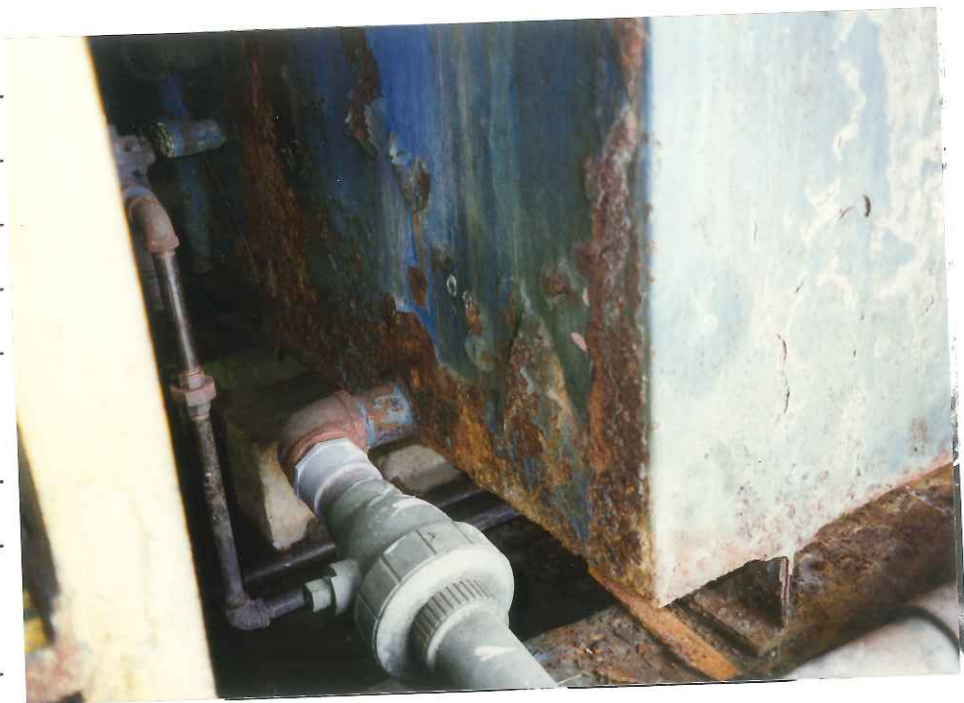
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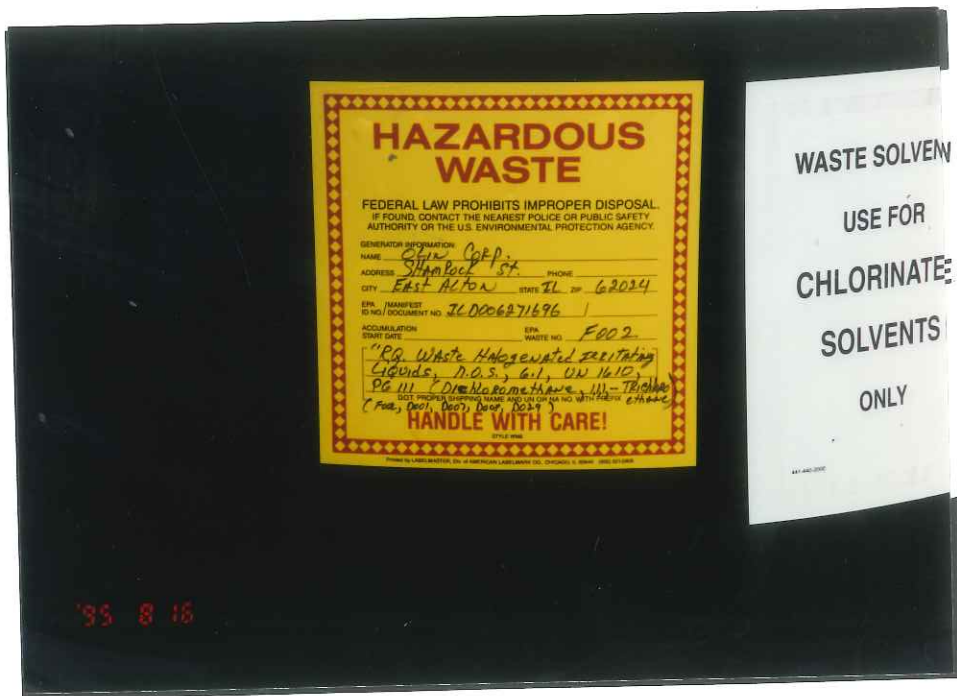
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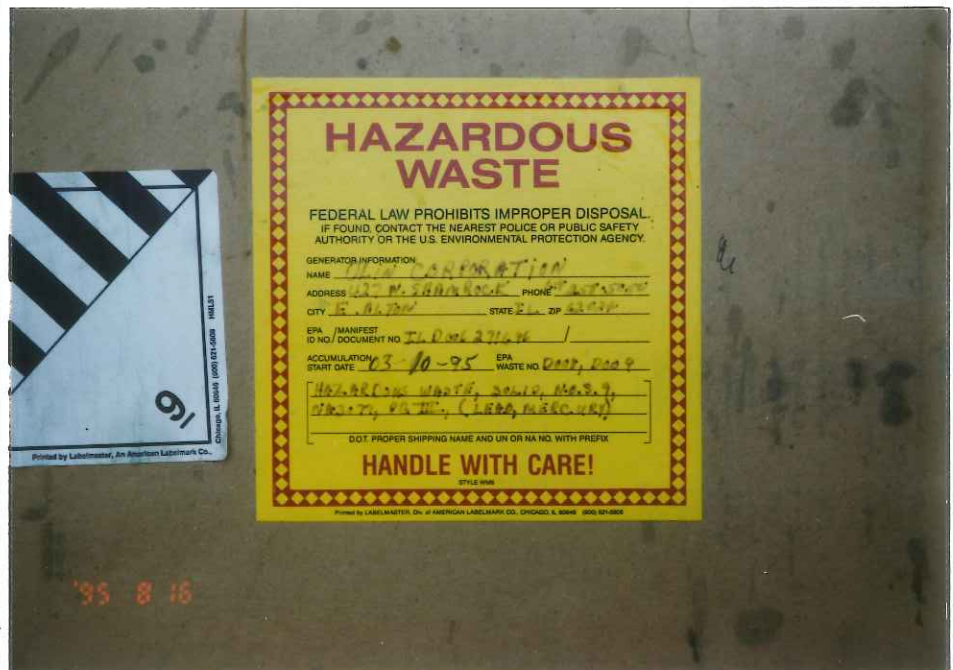




# INSPECTION PHOTOS

DATE: 08 / 16 / 95	SITE #: 1 1 9 0 2 0 0 0 2 CO.: Madison
TIME: 9:00 - 3:00	SITE NAME: Olin Corporation - Main Plant
PHOTOGRAPH TAKEN BY: <i>Chase</i>	
COMMENTS: Pictures taken toward: North	
ROLL #: 2639 PHOTO #: 1B	

DATE: 08 / 16 / 95
TIME: 9:00 - 3:00
PHOTOGRAPH TAKEN BY: <i>Chase</i>
COMMENTS: Pictures taken toward: East
ROLL #: 2639 PHOTO #: 2B



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DATE: 08 / 16 / 95	SITE #: 1 1 9 0 2 0 0 0 2 CO.: Madison
TIME: 9:00 - 3:00	SITE NAME: Olin Corporation - Main Plant
PHOTOGRAPH TAKEN BY: <i>[Signature]</i>	
COMMENTS: Pictures taken toward: East	
ROLL #: 2639 PHOTO #: 3B	

DATE: 08 / 16 / 95
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ROLL #: 2639 PHOTO #: 4B



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SOUTH

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ROLL# 2637 PHOTO# 6C

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# RCRA INSPECTION REPORT

TYPE OF FACILITY**TYPE OF INSPECTION**

### NON-REGULATED STATUS

**PART A**

**PART B PERMIT APPLICATION**

## ENFORCEMENT

### ORDERS ISSUED

**TSD FACILITY ACTIVITY SUMMARY**

IL 532-1834  
LPC-334 (12/89) Page 1

**OWNER****OPERATOR**

Name <u>Olin Corp</u>	Name
Address <u>427 Shamrock</u>	Address
City <u>East Alton</u>	City
State <u>Illinois</u> Zip <u>62024</u>	State Zip
Phone # <u>(618) 258-5038</u>	Phone #

**PERSON(S) INTERVIEWED****TITLE****PHONE #**

<u>Mike Redington</u>	<u>Manager, Utilities &amp; Env.</u>	<u>618/258-5394</u>

**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

<u>Chris Cahovsky</u>	<u>IEPA/EPF/FOS</u>	<u>618/346-5120</u>
<u>Ted Dragovich</u>	<u>IEPA/Permits</u>	<u>217/524-3300</u>
<u>Harry Chapel</u>	<u>IEPA/Permits</u>	<u>217/524-3300</u>
<u>Scott Hacke</u>	<u>IEPA/Permits</u>	<u>217/524-3300</u>

**PREPARED BY****AGENCY/TITLE****PHONE #**

<u>Chris Cahovsky</u>	<u>IEPA/EPF/FOS</u>	<u>618/346-5120</u>
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**SUMMARY OF APPARENT VIOLATIONS**

Area	Class	Section

Area	Class	Section

Area	Class	Section

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REMARKS

1190200002 - Madison County  
Olin Corp. Main Plant  
ILD006271696

On November 9, 1994, I conducted a follow-up inspection at Olin Corporation's Main Plant in East Alton, Illinois. Present during this inspection were Harry Chappel, Scott Hacke and Ted Dragovich of the Agency's Permit Section and Mike Redington of Olin.

The purpose of this follow-up was to inspect the ash handling practices at the Zone 3 hazardous waste incinerator (T03). During the operation of the incinerator the internal rams drag out a small amount of ash. This ash accumulated under the charge hoppers. During this reinspection I observed the area under the charge hoppers of Incinerators 1 and 2. I did not observed ash in these areas.

Olin intends to install access doors on the internal ram enclosure at the entry end of the incinerator and use a portable vacuum system to remove any accumulated ash. This will become a normal operating procedure of the incinerator. Olin will revise its RCRA Part B Permit Application to address this activity.

As a result of this reinspection and a November 22, 1994 revision letter to the September 14, 1994 Compliance Inquiry Letter, the apparent violation of 725.131 has been technically remediated.

CNC/OLIN14

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**RCRA HAZARDOUS WASTE CONTINGENCY PLAN**

**Submitted to:**

**OLIN CORPORATION  
EAST ALTON, ILLINOIS**

**Submitted by:**

**ADVENT  
Louisville, Kentucky**

**Previous Revision Date: October 1992  
Current Revision Date: August 1995**

**ADVENT Project 45519**



**RCRA HAZARDOUS WASTE CONTINGENCY PLAN**

**Submitted to:**

**OLIN CORPORATION  
EAST ALTON, ILLINOIS**

**Submitted by:**

**ADVENT  
Louisville, Kentucky**

**Previous Revision Date: October 1992  
Current Revision Date: August 1995**

**Approved By: \_\_\_\_\_  
M. F. Redington**

**Title: Manager, Utilities & Environmental Services**

**Date: \_\_\_\_\_**

**ADVENT Project 45519**

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Appendix A	Madison County Mutual Aid Agreement
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## 1.0 INTRODUCTION

The Olin Corporation (Olin) facility located in East Alton, Illinois (Facility) is a manufacturing complex for the Brass and Winchester Divisions of Olin. The Brass Division manufactures copper-based alloy strip and fabricated products; the Winchester Division manufactures small arms ammunition, ammunition components and explosives. The Facility is situated on 1,700 acres and is located approximately 20 miles east of St. Louis, Missouri.

The Hazardous Waste Contingency Plan (Plan) for the Facility consists of the plans and procedures to be implemented in the event of a release of hazardous waste which has the potential to threaten human health and/or the environment. This Plan has been developed to comply with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), Part 264, Subpart D and Title 35 of the Illinois Administrative Code (35 IAC), Part 724, Subpart D for those hazardous waste management unit (HWMUs) which are regulated by a Resource Conservation and Recovery Act (RCRA) Part B Permit. This Plan also addresses the requirements of 40 CFR 265, Subpart D and 35 IAC 725, Subpart D for those HWMUs which are subject to the 90-day generator regulations.

The Site Supervisor for each HWMU is responsible for immediately implementing specified emergency response procedures and notifying the emergency coordinator in the event of a release. The Plan will be implemented immediately upon a determination by the Site Supervisor (or designated alternate) that a condition exists at the Facility which immediately threatens human health and/or the environment, such as a fire, an explosion, or a spill. Each Site Supervisor and designated alternate is given training in recognizing emergency conditions.

Olin also has an Emergency Control Plan, a Hazardous Substance Spill Plan, and a Spill Prevention Control and Countermeasure Plan which address requirements of 35 IAC Parts 725.150 through 725.156. The Emergency Control Plan contains general procedures to be

undertaken in emergency situations. It includes the names and telephone numbers of individuals responsible in emergency situations. The Hazardous Substance Spill Plan was developed to respond to spills of acids, caustics, and other chemicals used or stored on-site and includes specific actions to be taken in the event of a release of any of these materials. The Spill Prevention Control and Countermeasure Plan addresses oil releases. Appropriate departments within Olin have received training in these procedures.

## **2.0 HAZARDOUS WASTE CONTINGENCY PLAN MANAGEMENT**

This Plan has been prepared in accordance with good engineering practice. Amendments and revisions shall be made following significant Facility, personnel, or process changes. The Plan will be updated, revised, distributed, and coordinated as explained in this section of the Plan.

### **2.1 HAZARDOUS WASTE CONTINGENCY PLAN REVISIONS**

The Plan will be revised if it should fail in an emergency, or if alterations of Facility operations increase the potential for a hazardous waste release or changes the response necessary in an emergency. The Plan will be reviewed whenever the Facility RCRA Part B Permit is revised. It will be updated if the Emergency Director or his alternate or the Emergency Coordinator or his alternate is changed, or if the list or location of emergency equipment significantly changes. The Plan will also be revised whenever there is a change in Facility operation, maintenance, design, or construction that materially increases the Facility's potential for fires, explosions, or releases of hazardous waste.

When the need for a Plan revision is identified for any of the above-stated reasons, the Emergency Coordinator or his alternate will arrange for the appropriate modification of the Plan. The revised Plan will be distributed to the personnel and entities listed in Section 2.2.

### **2.2 HAZARDOUS WASTE CONTINGENCY PLAN DISTRIBUTION**

A copy of the Plan is maintained within the Facility at multiple locations and is available for Agency inspection at the Olin Environmental Services Department.

The following personnel maintain a copy of the Plan:

Hazardous Waste Site Supervisors  
Manager, Facilities Engineering, Winchester  
Supervisor, Facilities Engineering, Brass  
Supervisor, Safety and Loss Prevention Services  
Chief, Plant Protection and DOD Services  
Fire Department Shift Leaders  
Utilities Watch Engineers  
Manager, Utilities and Environmental Services  
Manager, Regulatory Affairs

The following state and local entities also receive a copy of the Plan:

East Alton Police Department  
East Alton Fire Department  
Madison County Local Emergency Planning Committee  
Alton Memorial Hospital

## **2.3 COORDINATION AGREEMENT REQUIREMENTS**

Olin has a mutual aid agreement with the Madison County, Illinois, Firemen's Association which provides access to over 35 additional fire departments in case of emergency. Olin is also a member of the Twin Rivers Community Awareness and Emergency Response Unit.

Copies of this plan have been sent to East Alton Fire and Police Departments, the Local Emergency Planning Committee for Madison County, Illinois and the Alton Memorial Hospital.

In the event of an emergency requiring outside assistance, Olin's Emergency Director (or his alternate) will utilize the Madison County Mutual Aid Agreement (Appendix A) by contacting the East Alton Fire Chief and informing him of the emergency situation and the type of assistance needed. Since the Facility is located in the Village of East Alton, and since the East Alton Fire Department is required to provide emergency service to all industry



within the East Alton city limits, the Mutual Aid Agreement requires all participating members to respond to the "Stricken Municipality" as predetermined by the appropriate fire chief. Upon arrival on Olin property, the outside service(s) would be directly supervised by Olin's own security, fire, and medical personnel. In the event that injured Olin employees would need to be taken to area hospitals for treatment, the Olin Medical Department would arrange for transportation.

### 3.0 HAZARDOUS WASTE EMERGENCY EQUIPMENT

Brass Maintenance, the Protection Department, and individual HWMUs maintain equipment, materials and manpower to assist as needed in the event of a spill. This section lists equipment and material available.

#### 3.1 MOBILE EMERGENCY SPILL EQUIPMENT

The Facility maintains a full time Fire Department located at the Main Plant Facility (MPF). In the event of a significant release of a potentially hazardous substance, waste, or oil, the firefighters will lead a multi-disciplinary emergency response team trained in chemical release response and clean-up. The Fire Department operates and maintains a dedicated spill response vehicle equipped with pumping capability, sorbents, water pumps, personal protective clothing, overpack drums, etc. Olin also has mutual-aid agreement with the Madison County, Illinois Firemen's Association as described in Section 2.3.

#### 3.2 FACILITY EMERGENCY EQUIPMENT

1. Absorbent Material  
Zone 1 - No. 2 Stores - Speedy-Dry 490-020-3900  
Zone 17 - Stores - Zorb-all 490-020-3900
2. Sorbent Pads - Kept at No. 2 Storeroom  
Type 156 18" x 18" sheets - No. 100-100-4150
3. Empty 55 gallon drums - Contact MRF  
Transportation will be required for hauling.
4. Sorbent Booms - No. 2 Storeroom  
4 Booms/Bale - 10 ft/boom  
Storeroom No. 100-100-4160

Brass Mill Maintenance has sets of plugs to be used in the event of a spill to a sewer or the potential of a spill to a sewer. The types, quantities, and sizes of these plugs are below.

<u>Wooden Plugs</u>	<u>Air Bags*</u>	<u>Mechanical Plugs</u>
1 - 3"	1 - 3"	1 - 4"
1 - 6"	1 - 8"	3 - 6"
1 - 8"	1 - 18"	1 - 8"
1 - 12"		

\* Requires compressed air.

### 3.3 POST-EMERGENCY EQUIPMENT MAINTENANCE

After an emergency situation has passed, employees will decontaminate the equipment utilized and return it to the designated storage areas. The Environmental Services Department will be contacted to determine the proper management of the residues generated during the decontamination activities.

## 4.0 GENERAL FACILITY GUIDELINES

### 4.1 SPILL REPORTING

THE FIRE DEPARTMENT SHIFT LEADER (x2121) MUST BE NOTIFIED IMMEDIATELY IN THE EVENT OF ANY HAZARDOUS WASTE RELEASE OF MORE THAN ONE POUND OR ONE PINT. THE FILTER PLANT OPERATOR (x2628) OR UTILITIES WATCH ENGINEER (x3226) MUST BE NOTIFIED IMMEDIATELY IN THE EVENT OF ANY HAZARDOUS WASTE RELEASE WITH THE POTENTIAL TO REACH A SEWER OR OFF-SITE WATER.

In the event of a hazardous waste release, the on-duty Fire Department Shift Leader must immediately notify the Environmental Services Department (x5034) in order to comply with reporting requirements of local, state, and federal law. The Environmental Services Department Emergency Coordinator or his designee will notify the appropriate Facility personnel and federal, state, and local agencies, as necessary (refer to the Olin-East Alton Hazardous Substance Spill Plan for government agency reporting procedures). If a release occurs that has the potential to threaten human health or the environment outside the Facility, the release must be immediately reported to the National Response Center (1-800-424-8802), the Illinois Emergency Management Agency (IEMA) (1-217-782-7860), and the Madison County Local Emergency Planning Committee (LEPC) (1-618-692-6200). (IEMA will notify IEPA).

The Site Supervisor is responsible for contacting the Fire Department Shift Leader who will contact the Environmental Services Department.

If a release is serious enough to warrant response beyond the capabilities of the site where the incident has occurred, the Fire Department Shift Leader will notify Olin's Emergency Director so that the appropriate response is made available.

The Site Supervisors and their alternates, the Fire Department Shift Leaders, and the Environmental Specialist serve as the first line of emergency response for each RCRA Site. Their names, home addresses, and telephone numbers are contained in Section 4.1.1. of this Plan.

In addition to the immediate verbal reports, the Site Supervisor will note the date, time, and details of the incident in the RCRA Site operating record. The Environmental Services Department will, within 15 days, submit a written report to the IEPA which will include:

- 1) Name, address and telephone number of the owner or operator;
- 2) Name, address and telephone number of the Facility;
- 3) Date, time and type of incident (e.g., fire, explosion);
- 4) Name and quantity of material(s) involved;
- 5) The extent of injuries, if any;
- 6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- 7) Estimated quantity and disposition of recovered material that resulted from the incident.

Olin will maintain copies of each written report for at least five years.

#### 4.1.1 Designated Personnel and Responsibilities

##### Emergency Coordinator (Olin Emergency Director)

Any release which results in the release of chemicals, gases, or radiation that may affect the population surrounding any of Olin's property requires that the following designated Emergency Coordinator be notified immediately:

Greg Mortland (primary)  
304 Sanders  
Bethalto, IL 62010  
Home: ~~Non-responsive~~ Work: Olin Ext: 3100

Gary Turnbaugh (alternate)  
406 N. Maple  
Roxana, IL 62084  
Home: ~~Non-responsive~~ Work: Olin Ext: 5823

##### Environmental Specialists

The Environmental Specialist is responsible for contacting regulatory agencies, assessing the possible hazards to the environment, preparing and maintaining written reports that may be required after an incident, and all non-emergency clean-up activities. One of the following individuals must be contacted immediately in the event of a potentially reportable release:

Bob Mooshegian (primary)  
909 Hampton Court  
Godfrey, IL 62035  
Home: ~~Non-responsive~~ Work: Olin Ext. 5050

Mike Redington (alternate)  
11303 Bellefontaine Road  
Spanish Lake, MO 63138  
Home: ~~Non-responsive~~ Work: Olin Ext. 5394



### Industrial Hygienists

The Industrial Hygiene Department is responsible for assessing potential hazard to human health, and specifying proper levels of personal protection. Any release of potentially hazardous wastes or substances which threatens human health requires the presence of an Industrial Hygienist to evaluate the hazards. In such an emergency, one of the following individuals must be contacted immediately:

Brian Powers  
3738 Banbury  
St. Charles, MO 63303  
Home: **Non-responsive** Work: Olin Ext. 3067

Glenn Ledbetter  
12724 Stubwood Drive  
Florissant, MO 63033  
Home: **Non-responsive** Work: Olin Ext. 3065

### Fire Department Shift Leaders

The Fire Department Shift Leader will act as Incident Commander and coordinate and supervise implementation of emergency response actions as necessary. The Fire Department Shift Leaders rotate shifts so that one is on-duty 24 hours a day and can be reached at Olin Extension 2121. The Fire Department Shift Leaders must be notified immediately if over one pound or one pint of any potentially hazardous substance is released to the environment:

Glen Linder                      Olin Ext: 2121  
Bill Self  
Don Dodd  
Paul Barker

#### 4.1.2 RCRA Site Supervisors

The RCRA HWMU Site Supervisors are responsible for general operation and maintenance of their respective sites including immediate reporting of releases. The following is a list of RCRA Sites at the Facility along with the corresponding Site Supervisor and alternates. The locations of these sites are shown on Figures 3, 4, and 5.

##### SITE 1-1 Bullet Non-responsive

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Non-responsive [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Non-responsive [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Non-responsive [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Non-responsive [REDACTED] Olin Ext. 2576

SITE 1-6 Rimfire Deprime Tank

Terry Kessman (primary)

905 W. Main

Collinsville, IL 62234

Home: **Non-responsive** - Work: Olin Ext. 2462

Jerry Dunham (alternate)

R.R. #2

Brighton, IL 62012

Home: **Non-responsive** - Work: Olin Ext. 3303

SITE 1-7 Central Machine Shop Chromate Reduction Unit

Lonnie Cline (primary)

516 Big Arch Road

Godfrey, IL 62035

Home: **Non-responsive** - Work: Olin Ext. 3064

Tim Hanlon (alternate)

4822 Storeyland Drive

Godfrey, IL 62002

Home: **Non-responsive** - Work: Olin Ext. 2051

SITE 1-9 Analytical Lab Spent Solvent Storage

Doug Sheffield (primary)

6041 Pershing Ave.

St. Louis, MO 63112

Home: **Non-responsive** - Work: Olin Ext. 2501

Jim Pickett (alternate)

403 Shelby Street

Gillespie, IL 62033

Home: **Non-responsive** - Work: Olin Ext. 2354

SITE 1-11     Winchester WWTF Sludge Storage and  
Zone 6 WWTF Emergency Holding Lagoon

Steve Goodman (primary)  
R. R. #1, Box 69A  
Mt. Olive, IL 62096  
Home: **Non-responsive** - Work: Olin Ext. 2975

Mike Nolan (alternate)  
438 Greenview  
East Alton, IL 62024  
Home: (**Non-responsive**) - Work: Olin Ext. 2296

Larry Daniels (alternate)  
507 Sheridan  
Bethalto, IL 62010  
Home: **Non-responsive** - Work: Olin Ext. 3226

Charlie Buis (alternate)  
R. R. #2, P.O. Box 97B  
Brighton, IL 62012  
Home: **Non-responsive** - Work: Olin Ext. 3226

Ronald Hannig (alternate)  
215 Cedar Lane  
Staunton, IL 62088  
Home: **Non-responsive**

**Media Storage**

Ken Talley (primary)  
12189 Sage Meadow Ct.  
Maryland Heights, MO 63043  
Home: **Non-responsive** - Work: Olin Ext. 2741 or 2482

Lou Wadlow (alternate)  
165 St. Rose  
Godfrey, IL 62035  
Home: **Non-responsive** - Work: Olin Ext. 2592

SITE 1-19 Building 244 Tumbling Media Treatment

Don Greeling (primary)

126 Moore Street

Brighton, IL 62012

Home: ~~Non-responsive~~ - Work: Olin Ext. 2153

Stan Medley (alternate)

3509 Edwardsville Road

Edwardsville, IL 62025

Home: ~~Non-responsive~~ - Work: Olin Ext. 2450

Site 1-20 Shot Tower Lead Contaminated Oily Waste

Web Simms (primary)

920 LaCherie

Manchester, MO 63021

Home: ~~Non-responsive~~ - Work: Olin Ext. 3663

Pat Droege (alternate)

8357 Lois Lane

Alton, IL 62002

Home: ~~Non-responsive~~ - Work: Olin Ext. 2565

Ron Bartow (alternate)

410 South Park

Brighton, IL 62012

Home: ~~Non-responsive~~ - Work: Olin Ext. 3456

SITE 3-1 Zone 3 Incinerator

Roger L. Goodman (primary)

711 N. Plum

Mt. Olive, IL 62069

Home: ~~Non-responsive~~ ~~Non-responsive~~

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

361 - Work: Olin Ext. 2296

Larry Daniels (alternate)

507 Sheridan

Bethalto, IL 62010

Home: ~~Non-responsive~~

[REDACTED]

R. R. #2, P.O. Box 97B

Brighton, IL 62012

Home: (~~Non-responsive~~) - Work: Olin Ext. 3226

Ronald Hannig (alternate)

215 Cedar Lane

Staunton, IL 62088

Home: ~~Non-responsive~~ Work: Olin Ext. 3226

SITE 4-2a MRF Hazardous Waste General Storage

Ken Talley (primary)

12189 Sage Meadow Ct.

Maryland Heights, MO 63043

Home: ~~Non-responsive~~ Work: Olin Ext. 2741 or 2482

Lou Wadlow (alternate)

165 St. Rose

Godfrey, IL 62035

Home: ~~Non-responsive~~ Work: Olin Ext. 2592

SITE 4-4 R & D Kill Sumps

George Mei (primary)  
1873 Seven Pines Drive  
St. Louis, MO 63146  
Home: **Non-responsive** - Work: Olin Ext. 2650

Ron Stacey (first alternate)  
365 Ridge Meadow Drive  
Chesterfield, MO 63017  
Home: **Non-responsive** Work: Olin Ext. 2499

Jim Pickett (second alternate)  
403 Shelby Street  
Gillespie, IL 62033  
Home: **Non-responsive** - Work: Olin Ext. 2354

SITE 4-5a High Explosives (T-242) Kill Sump  
SITE 4-5b High Explosives (T-144) Kill Tank

Bill Moore (primary)  
916 Miller Drive  
Staunton, IL 62088  
Home: **Non-responsive** - Work: Olin Ext. 2576

Butch Fey (alternate)  
906 West Fifth Street  
Staunton, IL 62088  
**Non-responsive** - Work: Olin Ext. 2467

SITE 4-10 T-500 Tumbling Media Treatment

Steve Brunaugh (primary)  
215 Michelle Place  
Jerseyville, IL 62052  
Home: **Non-responsive** - Work: Olin Ext. 2022

Keith Baecht (alternate)  
200 W. Fairground Ave.  
Jerseyville, IL 62052  
Home: **Non-responsive** - Work: Olin Ext. 2444



SITE 17-3 Casting Plant Baghouse Bag/Dark Baghouse Dust Storage

Roger Basarich (primary)

1733 Bremen

Granite City, IL [redacted]

[redacted] Non-responsive [redacted]

[redacted]

[redacted]

[redacted]

[redacted] Non-responsive Work: Olin Ext. 5341

## 4.2 FACILITY DESCRIPTION

Olin operates two manufacturing facilities at its East Alton, Illinois location referred to as "Main Plant Facility" and the "Zone 17 Facility." The Main Plant Facility (MPF) includes operations of both the Brass Division and the Winchester Division while the Zone 17 Facility is operated solely by the Brass Division. The Brass Division manufactures copper-based alloy strip and fabricated products and the Winchester Division manufactures small arms ammunition, ammunition components, and explosives.

### 4.2.1 Main Plant Facility

The MPF comprises an area of approximately 1,272 acres divided into nine zones which are numbered as follows: 1, 2, 3, 4, 5, 6, 7, 14, and 15. The MPF includes one additional parcel of land referred to as "Railroad Property" and an access strip connecting the MPF with the Zone 17 Facility. Table 1 lists each of the zones within the MPF, a description of the activities that take place in each zone, and the approximate acreage for each zone.

Major manufacturing activities of the MPF are conducted in Zones 1, 2, and 4. Zone 3 is the location of the MPF incinerators and power house where steam is produced for the MPF process heating and space heating requirements. The location of the zones are shown on a comprehensive site plan provided as Figure 2.

MPF process-generated wastewater is treated at two wastewater treatment facilities (WWTF) located in Zone 6. The largest treatment facility, referred to as the Zone 6 WWTF, began operating in November 1974 and is designed to treat up to 6.25 million gallons of non-hazardous wastewater per day. The smaller treatment facility, referred to as the Winchester WWTF, began operating in January 1988 and is designed to treat up to 158,000 gallons of hazardous wastewater per day. Treated wastewater from both WWTFs is pumped into the force main to the Mississippi River and discharged in accordance with the Facility's NPDES permit. The non-hazardous sludge generated at the Zone 6 WWTF is dewatered and hauled

to an off-site landfill. The hazardous sludge generated at the Winchester WWTF is dewatered and manifested off-site for reclamation.

Stormwater and non-contact cooling water from Zone 1 discharges via combined sewers to the Zone 6 WWTF and via storm sewers or sheet runoff into the East or West Slough. The sloughs serve as collection basins for the non-contact cooling water and runoff. The East Slough discharges to the Zone 6 WWTF. The West Slough is pumped into the force main to the Mississippi River and discharged in accordance with the Facility's NPDES; however, the water in the West Slough can be diverted to the Zone 6 WWTF, if required. Stormwater from Zones 2 and 4 discharges directly to the Wood River.

All HWMUs (RCRA Sites), with the exception of Site 17-3, are located within the MPF. The location of the RCRA Sites within the MPF are presented in Figures 3 and 4. Site 17-3 is located within the Zone 17 Facility described below.

#### **4.2.2 Zone 17 Facility**

The Zone 17 Facility consists of a total land area of approximately 437 acres. One 90-day hazardous waste site is located in Zone 17 as shown in Figure 5. The Brass Division operates three manufacturing plants within the Zone 17 Facility which comprise an area of about 23 acres. The Casting Plant manufactures copper and copper-based alloy bars. Plant 3 and Plant 4 are a part of the Brass Mill operations based at the MPF and manufacture copper and copper-based alloy strip.

Process generated wastewaters from the three plants discharge into the process sewer system, which in turn leads to the Zone 17 WWTF. The Zone 17 WWTF began operating in November 1973 and is designed to treat up to 864,000 gallons of non-hazardous wastewater per day. Treated wastewater is pumped into the force main to the Mississippi River and discharged in accordance with the Facility's NPDES permit. The non-hazardous sludge generated at the Zone 17 WWTF is dewatered and hauled to an off-site landfill.

### 4.3 WASTES GENERATED

The following sections describe non-hazardous and hazardous wastes generated at the Facility.

#### 4.3.1 Non-Hazardous Wastes

Non-hazardous wastes generated at the Facility can be divided into the following categories: factory trash, waste oils, scrap small arms ammunition and primers, oil-contaminated solid waste, asbestos wastes, and pollution control wastes.

Combustible factory trash, which includes paper, wood, plastic, and cardboard waste, is generated throughout the Facility and sent to Zone 3 for incineration to produce steam (in waste heat boilers) for use in the MPF manufacturing operations.

Waste oils and water-soluble oils are generated throughout the Facility by a number of process operations. Oils are used as lubricants and for hydraulic machinery and associated equipment. Water-soluble oils are used as lubricants and as cutting and stamping solutions. Waste oils generated are reclaimed on-site or sent to off-site oil reclamation facilities.

Scrap small arms ammunition includes scrap from centerfire, rimfire, and shotshell manufacturing operations. These materials are sent to the Material Reclamation Facility (MRF) in Zone 4. The scrap centerfire and rimfire ammunition is processed to reclaim the metal components. These components are sent to Olin's-Casting Plant for use as a raw material or sold to off-site scrap metal dealers.

Scrap primers are a component of small arms ammunition manufacturing. They are sent to the MRF where they are processed in a manner similar to the scrap centerfire and rimfire ammunition.

Scrap shotshells are processed at the MRF to recover lead and steel shot. The lead shot is reprocessed at the Shot Tower in Zone 1 and the steel shot is sold to off-site scrap dealers. The plastic and cellulose wad material from the scrap shotshells are sent to Zone 3 for incineration as a non-hazardous waste.

Asbestos-containing waste is collected from building demolition projects, steam and water piping repair or removal, and other maintenance-related activities. The waste is accumulated in properly marked and closed containers and then routinely sent to an off-site landfill for disposal.

Oil-contaminated solid waste, which is generated throughout the Facility, consists of various types of factory trash that has been contaminated by oils. This type of waste includes cloth filters, absorbent pads and spill prevention materials, employee clothing, rags, paper, and wood. The oil-contaminated waste is segregated into combustible and non-combustible containers. Most of the oil-contaminated waste is combustible and is sent to Zone 3 for incineration and energy recovery while the non-combustible materials are sent to off-site landfills.

Non-hazardous sludge generated by the Zone 6 WWTF and the Zone 17 WWTF, as described in Sections 4.2.1 and 4.2.2 of this Plan, is routinely hauled to an off-site landfill.

#### **4.3.2 Hazardous Wastes**

Hazardous wastes generated at the Facility can be divided into the following categories: solvent wastes, wastes generated from small arms ammunition and explosives manufacturing, plating wastes, air and water pollution control wastes, tumbling media, and lead contaminated oily waste. This section outlines the disposition of the solid wastes and wastewaters. A more detailed description is provided in the individual site guidelines.

Wastewater from copper plating, chrome plating and explosives related operations are discharged to the Winchester WWTF. Wastewater from copper and chrome plating are

treated for cyanide and hexavalent chrome, respectively, prior to discharge to the Winchester WWTF.

Solvent wastes are generated from metal degreasing operations and from water proofing materials used in small arms ammunition manufacturing. These wastes are typically stored at a "90-Day" site before being sent to the MRF (Site 4-2a) where they are stored for up to 90 days from the accumulation start date or until truckload quantities are accumulated. The waste is then sent to an off-site solvent reclamation facility.

The wastes generated from small arms ammunition and explosives manufacturing include smokeless powder scrap, nitrocellulose scrap, priming mix scrap, mercury-contaminated ammunition destined for disposal, and mercury-contaminated debris as well as wastewater sludge generated from the treatment of wastewater from explosive operations.

Smokeless powder scrap, nitrocellulose scrap, and priming mix scrap are incinerated on-site at the Zone 3 Incinerators (Site 3-1).

Mercury-contaminated ammunition is a waste stream which consists of ammunition with brass shell cases that has been subjected to a "stress cracking" testing. The test involves the placement of several pieces of ammunition into a mercurous nitrate solution. Mercury-contaminated ammunition destined for disposal is stored on-site at Site 4-2a.

Mercury-contaminated debris consists of paper towels, rags, and gloves generated by cleaning laboratory benches and test equipment as well as ammunition which was tested using a mercurous nitrate solution. This waste is stored on-site at Site 4-2a while accumulating sufficient quantities for off-site reclamation, treatment, or disposal.

Pollution control hazardous wastes include hazardous sludge from the Winchester WWTF, filter media from operations which use baghouses to control particulate emissions, and incinerator ash from the two Zone 3 Incinerators.



Hazardous wastewater is conveyed to the Winchester WWTF for final treatment using chemical precipitation, solids separation and filtration for removal of inorganic contaminants. Hazardous wastewater from the copper plating operations (Site 1-1) and the chrome plating operation (Site 1-7) are pretreated for removal of amenable cyanide and hexavalent chrome prior to the metal precipitation process at the Winchester WWTF.

Residues from several explosives manufacturing operations are rendered non-explosive by chemical kills in sumps and subsequently pumped and transported to the Winchester WWTF. The sludge is off loaded into holding tanks and dewatered in the filter press used to dewater sludge from the Winchester WWTF. Filtrate from the press is routed to the head of the Winchester WWTF for treatment.

The sludge generated at the Winchester WWTF is a listed hazardous waste (K046 and F006) and is characteristically hazardous for lead (D008). The sludge is sent off-site for lead reclamation.

Discarded air pollution control filters are generated by routine replacement of worn fabric filtering bags used in baghouses to capture particulate emissions. The discarded bags may be hazardous due to their TCLP metals content. The discarded bags are washed to render them non-hazardous and incinerated or sent to a hazardous waste landfill.

The incinerator ash generated from the Zone 3 Incinerators is processed on-site with triple super phosphate to render it non-hazardous and is then sent to an off-site landfill.

Tumbling media is generated from various small arms ammunition manufacturing operations that tumble ammunition in cob meal (ground-up corn cobs and walnut shells) to clean and burnish the ammunition. The lead-contaminated tumbling media is processed on-site with triple super phosphate to render it nonhazardous and is sent to an off-site landfill.

Lead contaminated oily waste is generated at the Shot Tower and consists of absorbent materials, rags, gloves, etc. The waste is stored at a "90-Day" storage site and then shipped to an off-site hazardous waste landfill.

#### **4.4 GENERAL EVACUATION PLAN**

If evacuation of personnel from an area is required, the Emergency Coordinator, or by direction, the Fire Department Shift Leader, will communicate the necessary evacuation orders through available communication means.

Site specific maps in Figure 6 through Figure 14 show primary and alternate evacuation routes to be used by personnel at HWMUs in the event of an evacuation emergency. Evacuation should be accomplished per the procedures established in the individual site evacuation plans.

#### **4.5 PLANT SECURITY**

Plant security is maintained by a fence surrounding the Facility, manned and video monitored security gates, and patrolling by plant protection personnel. Facility lighting is provided 24 hours a day. The lighting assists in discovery of spills which occur during hours of darkness, both by operating personnel working second and third shifts and by other non-operating personnel having access to the Facility. Facility lighting also aids in prevention of releases which might occur through acts of vandalism.

#### 4.6 FIRE, EXPLOSION, AND RELEASE COUNTERMEASURES

The Olin Fire Department is trained to rapidly respond to any fire, explosion, or hazardous substance or waste release at the Facility. Each Site Supervisor is also trained to prevent the release or spread of hazardous waste. Olin policy requires that any activity which contributes to the occurrence or spread of a fire or explosion or the release of hazardous waste is immediately modified.

During an emergency, the Site Supervisor, Fire Department Shift Leader, and the Emergency Coordinator will ensure that all reasonable measures necessary are taken to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous waste at the Facility.

These measures will include, where applicable, stopping processes and operations, collecting and containing releases of waste, and removing or isolating containers.

Olin maintains a full time Fire Department located at the MPF with 11 firefighters. The five different types of fire alarm systems in use throughout the plant are manually operated, heat actuated, smoke actuated, water flow actuated, and telephones.

Whenever any of these alarms are actuated, the Fire Department is automatically notified of the location and the appropriate response is taken by the firefighters. Equipment available to fight fires includes:

- 1) One 1,000 gallon per minute (gpm) pumper hazmat vehicle;
- 2) One 450 gpm pumper fire truck;
- 3) 2050 fire extinguishers located throughout the Facility;
- 4) 100 individual water sprinkler systems located throughout the Facility;
- 5) 25 individual carbon dioxide systems located throughout the Facility;

- 6) Fire hydrants located throughout the Facility;
- 7) Three completely independent water supply sources with the following flow capabilities:
  - a. Mississippi River 4,200 gpm
  - b. Ranney Well 3,000 gpm
  - c. Gravel Pack Wells 3,000 gpm; and
- 8) 20 Class-D fire extinguishers for fires involving magnesium located in the machine shop.

In addition to the above-described equipment, the Zone 3 Incinerators have automatic sprinkler systems inside the incinerator building as described below. Each incinerator is equipped with a flame detector immediately above the charging hopper. If a flame is detected, a water spray is automatically activated to extinguish the fire. The flame detector also activates a horn to alert the incinerator operator. When the flame is extinguished, the water spray and the horn automatically turn off.

A second sprinkler system serves the entire Zone 3 Incinerator building. Sprinkler heads are located throughout the building at roof level to provide sprinkler coverage for 100% of the floor area. In addition, there is a sprinkler head located immediately above each of the two vibratory conveyors which feed shredded trash into the charge hoppers. If any of these sprinkler heads is subjected to a temperature of 285°F or greater, the sprinkler head is automatically activated. When a sprinkler in this system is activated, a loud bell is automatically sounded to alert occupants of the building and a signal is sent through the plant notifier system to the Olin Fire Department. The Fire Department immediately sends a fire truck and crew to respond to the alarm. After Fire Department personnel confirm that the fire is out or under control, they turn off the water flow to the sprinkler system. The sprinkler head which was activated is immediately replaced, the sprinkler system is reset and then put back in service.

In the event of an emergency, in addition to the fire alarms, telephones and/or radios would be used for internal and external communications.

All Olin employees are trained to respond to small fires with fire extinguishers. If a fire can not be controlled with fire extinguishers, the fire department will be notified.

#### 4.7 SLOUGH RELEASES

The West Slough discharges by force main to the Mississippi River. The East Slough discharges to the Zone 6 WWTF through the Machine Gun Pump Station. In the event there is a release into the West Slough, the following actions should be taken to minimize a discharge to the Mississippi:

1. Shut West Slough force main pump off;
2. Contact the Filter Plant Operator (x2628) or the Watch Engineer (x3226) immediately;
3. The Watch Engineer will then divert the discharge of the West Slough to the Machine Gun Pump Station by closing the gate valve north of the pump station;
4. The party responsible for the release is also responsible for immediate clean-up. Brass Maintenance maintains equipment, materials and manpower to assist in the event of a release; and
5. In the event of a release to off-site water, the Watch Engineer must immediately notify the Environmental Services Department for compliance with reporting requirements of federal, state, and local regulations.

#### 4.8 CONTAINER STORAGE

Containment is provided for areas that treat and store hazardous waste. Site-specific guidelines for HWMUs are provided in Sections 5 and 6 of this Plan.



#### 4.9 TANK STORAGE AND TREATMENT

The Facility does not use underground tanks to store or treat hazardous wastes. Area supervisors should visually inspect above ground tanks, containers, valves, and piping and recommend testing when significant corrosion, deterioration, material failure, or wear is discovered.

For each existing tank system that does not have secondary containment, Area Supervisors must obtain and keep on file a written assessment reviewed and certified by an independent, qualified registered professional engineer who attests to the tank system's integrity. This assessment must determine that the tank system is adequately designed and has sufficient structural strength and compatibility with the waste(s) to be stored or treated, to ensure that it will not collapse, rupture, or fail. The assessment will consider the following:

- Design standard(s), if available, according to which the tank and ancillary equipment were constructed;
- Hazardous characteristics of the waste(s) that have been and will be handled;
- Existing corrosion protection measures; and
- Documented age of the tank system, if available, (otherwise, an estimate of the age).

Tanks should be entered only when absolutely necessary and in accordance with all confined space entry procedures.

Site specific guidelines for Facility tank storage and treatment sites are provided in Sections 5 and 6 of this Plan.

## **5.0 RCRA PART B (STORAGE AND TREATMENT) SITE GUIDELINES**

The Facility operates four RCRA units which require a RCRA Part B Permit. The first unit, referred to as the Container Storage Unit, is located at the MRF within Site 4-2a. It is used for the storage of mercury contaminated ammunition and mercury-contaminated debris destined for disposal.

The second and third units are two identical incinerators referred to as the Zone 3 Incinerators (Site 3-1). These units are used for the incineration of explosive wastes as well as several nonhazardous wastes and factory trash.

The fourth unit requiring a Part B permit is the Zone 6 WWTF Emergency Holding Lagoon (Lagoon). The Lagoon is undergoing delayed closure and no longer receives hazardous waste.

### **5.1 RCRA PART B SITE SUPERVISOR RESPONSIBILITIES**

It is the responsibility of each RCRA Part B Site Supervisor to ensure that the Site is in compliance with this Plan. This responsibility includes performing necessary inspections, directing non-emergency spill clean-up activities, training of operating personnel, and advising the Environmental Services Department of any changes to operations which may require revisions to this Plan.

Site Supervisors are also responsible for housekeeping, maintenance, and immediate reporting requirements. They are responsible for ensuring that all detected leaks or spills must be confined, recovered, and cleaned up when discovered. The source of the leak or cause of the spill must be determined and corrected.

Line supervision is responsible for properly instructing its personnel in the operation and maintenance of equipment to prevent hazardous waste releases. Spill prevention meetings with operating personnel should be conducted at intervals frequent enough to assure adequate understanding of the Plan requirements. Training must be conducted and documented using site-specific training records at least annually. The training records should be retained at the site for three years and copies sent to the Environmental Services Department. The training can take the form of prevention and response briefings at regularly scheduled employee meetings. New employees must receive initial training within two weeks of assuming duties.

## 5.2 RCRA PART B SITE SPECIFIC GUIDELINES

This section contains site-specific procedures for the RCRA Part B hazardous waste sites listed below:

<u>Site No.</u>	<u>Site Name</u>
1-11	Zone 6 WWTF Emergency Holding Lagoon
3-1	Zone 3 Incinerators
4-2a	MRF Container Storage Unit

### 5.2.1 Zone 3 Incinerators

Site Code: 3-1  
Site Name: Zone 3 Incinerators  
Building No.: SS-300  
Supervisor: R. Goodman  
Alternate: L. Daniels  
Phone No.: 2260

#### SITE DESCRIPTION

Site 3-1 consists of two identical hazardous waste incinerators, each with a waste heat boiler, and four "90-Day" units for collection of incinerator ash. The primary purpose of the incinerators is to burn combustible factory trash generated at the Facility, and occasionally, uncontaminated Type "O" Waste (as defined by Illinois solid waste regulations) from local off-site sources to produce steam. The second purpose of the incinerators is to burn explosive waste (smokeless powder scrap, nitrocellulose scrap and priming mix scrap) and several nonhazardous wastes generated at the MPF.

Pollution control equipment for the incinerators includes two baghouses to control particulate air emissions. Dry lime is injected into the exhaust stream prior to the baghouses to coat the bags.

The "90-Day" units at Site 3-1 are discussed in Section 6 of this Plan.

#### OPERATING UNITS

Two hazardous waste incinerators.  
Explosives waste storage building ("90-Day" storage).  
Ash containers ("90-Day" storage).  
Ash stabilization treatment unit ("90-Day" treatment).  
Baghouse bags storage ("90-Day" storage).

## DESCRIPTION OF HAZARDOUS WASTES TREATED

### A. Explosive wastes:

1. Smokeless powder scrap is generated at various locations within the MPF from small arms ammunition manufacturing. The waste is packaged at the MRF and placed into four-gallon plastic-lined polyethylene buckets which are filled with a minimum of one gallon of water and ethylene glycol (during the winter) and a maximum of 22 pounds of powder. Spic & Span is added to alleviate surface tension.
2. Priming mix scrap consists primarily of cloth rags and sponges that are contaminated with small quantities of priming mix. Priming mix is explosive, thereby rendering the waste hazardous. The rags and sponges are used to clean bowls, tools, and other manufacturing equipment in contact with priming mix. When the rags and sponges are worn out, they are put into four gallon plastic-lined polyethylene buckets which are filled with a minimum of one gallon of water, 250 grams of 50% sodium hydroxide solution, and ethylene glycol (during the winter).
3. Nitrocellulose scrap is generated from the manufacture of ejection cartridges. The waste is put into plastic-lined polyethylene buckets which are then filled with a minimum of one gallon of water and ethylene glycol (during the winter).

## DESCRIPTION OF WASTES GENERATED

The ash generated from incineration operations is considered hazardous for the characteristic of lead. The ash is placed in 1-cubic yard containers prior to being rendered non-hazardous by treating it with triple super phosphate in the ash stabilization treatment unit. Following treatment, the ash is placed in 15 cubic yard roll-off containers for disposal at a non-hazardous waste landfill. All ash is treated within 90 days of generation. The treatment unit is inspected daily. Additionally, baghouse bags are changed annually and are hazardous due to lead and cadmium. Baghouse bags are stored temporarily prior to on-site washing and incineration.

## EMERGENCY ACTION

The Olin Health and Safety Program and site specific contingency procedures will be implemented immediately upon determination by the Site Supervisor that a condition exists which immediately threatens human health and the environment. The Olin Plant Fire Department and the Environmental Services Department will also be notified immediately to respond to the release and handle necessary reporting.

### A. Spill of Explosive Material

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE OR IGNITABLE WASTES UNLESS 100% BRASS.**

1. Prior to performing spill response activity, personnel shall don appropriate personal protective equipment.
2. If the entire contents of a container has spilled, the spill should first be contained with granular absorbent, absorbent booms, or absorbent pads.
3. If smokeless powder scrap or nitrocellulose scrap has been spilled, the liquid and solids should be wiped off of the floor with sponges or a disposable mop. The entire quantity of spilled material and clean up materials should be placed into buckets and incinerated.

If priming mix scrap has been spilled, the spillage should first be contained and then treated with a 25% ammonium acetate solution, so as to prevent crystallization of the priming mix. The remaining procedures to be followed are the same as those for smokeless powder.

4. For all spills contact the Site Supervisor. If necessary, the Site Supervisor will report the spill to Fire Department. In emergency situations, the Fire Department should be contacted directly.

### B. Spill of Incinerator Ash or Baghouse Dust

1. If incinerator ash or baghouse dust has been spilled, the spilled material should be scooped up and swept carefully so as not to raise dust. The material should then be placed back into its original container.



2. For all spills contact the Site Supervisor. If necessary, the Site Supervisor will report the spill to the Fire Department. In emergency situations, the Fire Department should be contacted directly.

C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and/or water hoses as necessary to extinguish or control the fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which in turn could create a fire in the incinerator building.

In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately as described in Subsection H below.

E. Emergency Equipment

- broom
- shovel; rubber dust pan
- coveralls
- steel-toed shoes
- hard hat
- safety glasses and plastic face shield
- rubber gloves and boots
- treatment chemicals to desensitize explosives (ammonium acetate)
- disposable mops; bucket; and sponges
- replacement combustible container
- cotton dust masks
- absorbal and/or absorbent pads

F. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material that results from a release, fire or explosion, will be properly treated on-site, or contained, packaged, and sent to an off-site hazardous waste facility.

All emergency clean-up equipment shall be decontaminated after use by washing or wiping clean. Any rinse water should be treated in the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

G. Health Hazards

Various wastes incinerated or generated at Zone 3 could contain hazardous substances. Heavy exposure including excessive absorption into the body must be avoided.

Explosive Waste: Deflagration caused by a source of heat or improper handling.

Lead Exposure: Chronic health hazard through ingestion, inhalation, and/or skin absorption.

H. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should use the following evacuation routes and immediately contact the Site Supervisor:

Primary Evacuation Route

Leave Bldg. SS-300 at the north end doorway as shown on the Evacuation Plan (Figure 10) and proceed north to the assembly area near the guard house.

Alternate Evacuation Route

Leave Bldg. SS-300 at the east end doorway as shown on the Evacuation Plan (Figure 10) and proceed north to the assembly area near the guard house.

### 5.2.2 Material Reclamation Facility - Site 4-2a

Site Code: 4-2a

Site Name: Container Storage Unit

Building No.: N/A

Supervisor: K. Talley

Alternate: L. Wadlow

Phone No.: 2482, 2741

#### SITE DESCRIPTION

Site 4-2a consists of one Part B permitted storage unit and several "90-Day" units. The permitted storage unit is referred to as the Container Storage Unit. It consists of a prefabricated steel structure with approximately 192 square feet of storage capacity, a grated floor and spill containment. This unit sits on a concrete pad and is used for the storage of mercury-contaminated ammunition and debris destined for disposal.

The "90-Day" units at Site 4-2a are discussed in Section 6 of this Plan.

#### OPERATING UNITS

Container Storage Unit

#### DESCRIPTION OF HAZARDOUS WASTES STORED

The two waste types stored in the Container Storage Unit (Site 4-2a) are mercury-contaminated ammunition and mercury-contaminated debris. The mercury-contaminated ammunition consists of loaded and/or unloaded rounds of ammunition with brass shell cases that have been subjected to a "stress cracking" test. The test involves the placement of ammunition into a mercurous nitrate solution for a specific amount of time. This waste stream is hazardous (D008) due to its lead content only.

The second waste stream consists of mercury-contaminated debris generated by cleaning the ammunition, laboratory benches and test equipment with paper towels, rags, and gloves. This waste stream which is hazardous for lead (D008) and mercury (D009).

No free liquids are contained in either waste stream.

### EMERGENCY ACTION

#### A. Spill of Explosive or Ignitable Wastes

The Olin Health and Safety Program and site specific contingency procedure will be implemented immediately upon determination by the Site Supervisor that a condition exists which immediately threatens human health and the environment. The Olin Fire Department and the Environmental Services Department will also be notified immediately to respond to the release and handle any necessary reporting.

#### B. Spill of Solid Material From Container

Immediately contact the Site Supervisor. Clean up spill with broom and shovel. Place spilled material back into appropriate container. The Site Supervisor will contact the Olin Fire Department and Environmental Services as appropriate.

#### C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to extinguish or control the fire.

#### D. Potential of Explosion

In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately as described in Subsection H below.

#### E. Emergency Equipment

- gloves
- coveralls
- overpack drums
- shovels

- broom
- safety glasses
- steel-toed shoes

F. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material that results from a release, fire or explosion, will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

All emergency clean-up equipment shall be decontaminated after use by washing or wiping clean. Any wash water should be treated in the Winchester WWTF and any soiled or contaminated wipes should be containerized for proper disposal.

G. Health Hazards

Mercury-contaminated ammunition and debris contains lead, mercury, and other hazardous substance. Heavy exposure including excessive absorption into the body must be avoided.

H. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should evacuate through the closest safe exit and contact the Site Supervisor. Evacuation routes for site 4-2a are shown on Figure 11.

### 5.2.3 Zone 6 WWTF, Emergency Holding Lagoon - Site 1-11

Site Code: 1-11

Site Name: Zone 6 WWTF Emergency Holding Lagoon

Building No.: N/A

Supervisor: S. Goodman

Phone No.: 2975

#### SITE DESCRIPTION

The Zone 6 WWTF emergency Holding Lagoon (Lagoon) is an earthen structure with interior slopes covered with asphaltic concrete. Wastewater from the Zone 6 WWTF is diverted to the Lagoon during periods of excessive flow, if a treatment upset has occurred or if maintenance activities to the WWTF are required. After the WWTF returns to normal operation, the wastewater diverted to the Lagoon is drained back to the WWTF. The Lagoon no longer receives wastewater from processes that generate listed hazardous waste sludges. Any sludge which accumulates in the Lagoon is nonhazardous and is flushed to the Zone 6 WWTF with potable water and the solids cleaned out.

The Lagoon is currently undergoing delayed closure and has been included in the Facility's RCRA Part B Permit Application.

Site 1-11 also includes a "90-Day" storage site for the Winchester WWTF sludge and is discussed in Section 6 of this Plan.

#### OPERATING UNITS

Zone 6 WWTF Emergency Holding Lagoon: One million gallon capacity.



## DESCRIPTION OF HAZARDOUS WASTE

No hazardous waste is managed in the Lagoon. The Lagoon no longer receives wastewater from processes which generate listed hazardous waste sludges. Standard operating procedures require that the Lagoon is cleaned and sealed annually, and washed free of residues immediately following each use. Water from the Lagoon drains by gravity to a drain pump, where it is pumped to the Zone 6 WWTF.

## 6.0 RCRA 90-DAY (GENERATOR) SITE GUIDELINES

RCRA 90-Day Hazardous Waste Sites include "90-Day" storage and treatment sites that do not require a Part B Permit, but must be included in a contingency plan since the Facility is a large quantity generator of hazardous waste. Satellite storage sites and other hazardous waste locations not specifically identified in this plan should use the general "Best Management Practices" in Section 6.2.

### 6.1 RCRA 90-DAY SITE SUPERVISOR RESPONSIBILITIES

It is the responsibility of each "90-Day" Site Supervisor to ensure that the Site is in compliance with this Plan. This responsibility includes performing necessary inspections, directing non-emergency spill clean-up activities, training of operating personnel, and advising the Environmental Services Department of any changes which may require revisions to this Plan.

Site Supervisors are also responsible for housekeeping, maintenance, and immediate reporting requirements. All detected leaks or spills must be confined, recovered, and cleaned up when discovered. The source of the leak or cause of the spill must be determined and corrected.

Line supervision is responsible for properly instructing its personnel in the operation and maintenance of equipment to prevent hazardous waste releases. Spill prevention meetings with operating personnel should be conducted at intervals frequent enough to assure adequate understanding of the Plan requirements. Training must be conducted and documented using site-specific training records at least annually. The training records should be retained at the site for three years and copies sent to the Environmental Services Department. The training can take the form of prevention and response briefings at regularly scheduled employee meetings. New employees must receive initial training within two weeks of assuming duties.

## 6.2 BEST MANAGEMENT PRACTICES

The following best management practices are applicable to all hazardous waste generating, satellite storage, "90-Day" storage, and treatment sites whether or not they are identified in this Plan:

1. Tanks, drums, valves, pipes, containment structures, overfill alarms, and related equipment must be visually inspected monthly. These inspections can be conducted by the equipment owner or operator during routine use. Equipment and containers that are malfunctioning, rusted, corroded, of poor integrity, or leaking must be repaired, replaced, or removed from service.
2. Dikes and other containment structures must be emptied after every rain or daily during periods of prolonged rainfall. Drainage, pumping, or other discharge should be accomplished by manual means and only after visual inspection to ensure that no wastes or hazardous substances will be released from the containment area. Dike valves must remain closed at all times unless manned.
3. Incompatible wastes should not be stored or treated in the same area. Contact the Environmental Services Department (x5034) if the compatibility of wastes is in question. Wastes should not be stored with chemicals, solvents, oil, parts, or other non-waste items.
4. Any spill on concrete or other paved surfaces must be confined, recovered, and cleaned up with sorbent materials when discovered. Spills on gravel or soil surfaces will require removal and replacement of any contaminated materials. The source of the leak or cause of the spill shall be determined and corrected. Disposal of any waste or other material shall be in accordance with current approved methods as determined by the Environmental Services Department. Uncontaminated similar materials are to be used to replace any removed.

## 6.3 RCRA 90-DAY SITE SPECIFIC GUIDELINES

### 6.3.1 Bullet Plating Facility

Site Code: 1-1

Site Name: Cyanide Destruct/Cyanide Storage

Building No.: 115

Supervisor: W. Simms

Phone No.: 3663

#### SITE DESCRIPTION

The location consists of electroplating operations where steel and lead components of small arms ammunition are copper plated. Cyanide bearing wastes generated during the plating operation are managed in four separate HWMUs within Site 1-1.

Wastewater from the plating operation is treated in the "Cyanide Destruct Unit" using alkaline chlorination to oxidize the amenable cyanide to cyanate. The system is comprised of two tanks in series as shown in the Schematic 1.1. Sodium hydroxide is used to maintain an elevated pH while sodium hypochlorite is added to increase the oxidation reduction potential (ORP) of the waste and oxidize the free cyanide. The chemicals are added near the influent of the first treatment tank by metering pumps controlled by pH and ORP controllers to maintain the desired set points.

Treated wastewater flows from the second treatment tank by gravity into a sump, which serves as a lift station, and where it is pumped to the Winchester WWTF. The sump is also an operating unit of Site 1-1. Treatment of the wastewater is regulated by the Facility's NPDES permit.

Solid material such as metal, wood or plastic which becomes contaminated with cyanide, are treated in a separate tank in the plating area. The tank is the third operating unit within Site 1-1. The solids are placed in the tank and covered with a sodium hypochlorite solution for treatment of the cyanide. Treatment is continued until no free cyanide is detected in

laboratory analyses of samples of the solid material. Following treatment, the liquid in the tank is pumped to the "Cyanide Destruct Unit" for treatment. The treated solids are containerized and disposed.

Other cyanide contaminated materials which cannot be treated by the existing treatment units are containerized in 55-gallon drums and staged in the fourth operating unit prior to shipment for disposal off-site. The staging area is a concrete pad provided with a secondary containment curb. The wastes staged in the area are managed in accordance with "90-Day" generator regulations.

### OPERATING UNITS

Cyanide Destruct Tank: Two in-line above-ground steel tanks. The first tank has a capacity of 1,330 gallons and the second tank has a capacity of 1,140 gallons. The tanks are provided with secondary containment capable of holding 1,100 gallons. A schematic showing the tanks and associated piping is provided as Schematic 1-1.

Sump: One 1,120-gallon in-ground concrete tank serves as a lift station to pump the pretreated wastewater to the Winchester WWTF for further treatment. Solids which accumulate in the tank are typically removed twice per year and transported to Site 1-11 for dewatering.

Cyanide Decontamination Tank: One 230-gallon tank for decontamination of cyanide contaminated materials.

Storage Area: 140-square feet area for storage of up to 32 fifty-five gallon drums of cyanide contaminated materials. The area is provided with a secondary containment curb capable of containing 520 gallons.

### DESCRIPTION OF HAZARDOUS WASTE STORED

Waste cyanide containing liquid and/or contaminated solids.

## DESCRIPTION OF HAZARDOUS WASTES TREATED

Cyanide contaminated wastewater and solids.

## EMERGENCY ACTION

### A. Spills

Any spills from the cyanide treatment tanks will be contained by the concrete dike. Spilled solution will either be pumped back into tank after leak has been fixed, or pumped into 55-gallon steel drums for temporary storage.

Spilled material from 55-gallon drums should be put back into appropriate container(s).

### B. Evacuation Procedures

If a release occurs which requires evacuation, the following evacuation routes shall be used:

#### Primary Evacuation Route

Leave Bldg. 115 at the east end doorway and proceed south to the open quadrangle area near Bldg. 268.

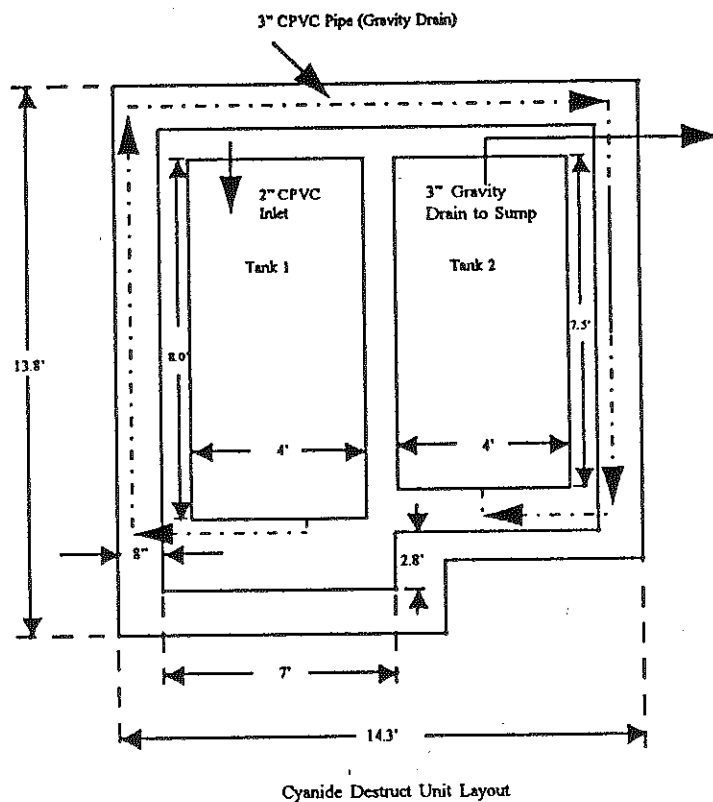
#### Alternate Evacuation Route

Leave Bldg. 115 at the west end doorway and proceed north until several hundred feet away from building.

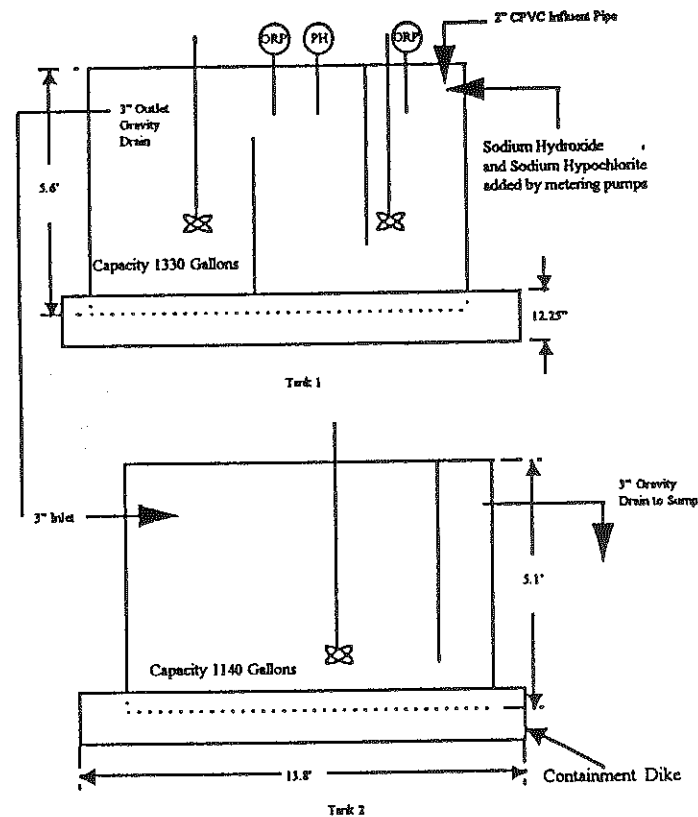
A map indicating evacuation routes is included as Figure 9.

## WASTE CONSTITUENTS OF CONCERN: Cyanide and Lead





NOT TO SCALE



DRAWN BY: J.G.S. CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



SCHEMATIC 1-1  
CYANIDE DESTRUCT UNIT

JUNE 1995

### 6.3.2 PRIMER ISLAND "KILL" SUMP

Site Code: 1-3  
Site Name: Primer Island "Kill" Sump  
Building No.: 116  
Supervisor: K. Pohlman  
Phone No.: 2523

#### SITE DESCRIPTION

This site consists of a 1,400-gallon in-ground concrete sump which treats explosives containing wastewater. The treatment process consists of continuous settling of explosive solids in the sump. Sodium hydroxide and aluminum powder are added to chemically reduce ("kill") the explosives in a batch process. Following the "kill" and settling of the solids, the clarified wastewater is discharged to the Winchester WWTF. The solids are removed from the sump and transported to Site 1-11 for dewatering.

#### OPERATING UNITS

One 1,400-gallon in-ground concrete sump.

#### DESCRIPTION OF HAZARDOUS WASTES TREATED

Wastewater containing explosives.

#### EMERGENCY ACTION

##### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS 100% BRASS.**

1. Personnel responding to the spill responsible for containment or clean up should don an acid suit, rubber gloves, and a plastic face shield before performing any clean-up activity.

2. The spill should be contained with granular absorbent, soda ash absorbent booms, or absorbent pads prior to clean-up. The spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

B. Evacuation Procedures

If a release occurs which requires evacuation, the following evacuation routes shall be used:

Primary Evacuation Route

Leave building 116 at the south end doorway and continue to proceed south until several hundred feet away from building.

Alternate Evacuation Route

Leave building 116 at the south end doorway and continue to proceed north until several hundred feet away from building.

A map indicating evacuation routes is included as Figure 8.

C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to put out or control the fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. In the event of a fire that cannot be easily extinguished, personnel, who are in the building should evacuate immediately using the routes shown on Figure 8.

E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, repackaged, and sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment is decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENTS OF CONCERN: Lead and Barium

### 6.3.3 Primer Bowl Cleaning Sumps

Site Code: 1-4

Site Name: Primer Bowl Cleaning Sumps

Building No.: 316

Supervisor: K. Pohlman

Phone No.: 2523

#### SITE DESCRIPTION

This site consists of two 150-gallon above-ground stainless-steel tanks and one 180-gallon in-ground stainless-steel sump which treat explosives containing wastewater. The treatment process consists of continuous settling of explosive solids in the tanks and/or sump. Sodium hydroxide and aluminum powder are added to chemically reduce ("kill") the explosives in a batch process. Following the "kill" and settling of the solids, the clarified wastewater is discharged to the Winchester WWTF. The solids are removed from the tanks and/or sump and transported to Site 1-11 for dewatering.

#### OPERATING UNITS

Two above-ground stainless-steel tanks and one in-ground stainless-steel sump.

#### DESCRIPTION OF HAZARDOUS WASTES TREATED

Wastewater containing explosives.

#### EMERGENCY ACTION

##### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR  
CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS  
100% BRASS.**

1. Personnel responding to the spill responsible for containment or clean up should don an acid suit, rubber gloves, and a plastic face shield before performing any clean-up activity.
2. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. The spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

B. Evacuation Procedures

If a release occurs which requires evacuation, the following evacuation routes shall be used:

Primary Evacuation Route

Leave 316 at the east end doorway and continue to proceed southeast until several hundred feet away from building.

Alternate Evacuation Route

Leave building 316 at the east end doorway and continue to proceed northwest until several hundred feet away from building.

A map indicating evacuation routes is included as Figure 6.

C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to put out or control the fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately using the routes shown in Figure 6.



E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, repackaged, and sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENTS OF CONCERN: Lead and Barium

### 6.3.4 Rimfire Bowl Cleaning Sumps

Site Code: 1-5  
Site Name: Rimfire Bowl Cleaning Sumps  
Building No.: 209  
Supervisor: K. Pohlman  
Phone No.: 2523

#### SITE DESCRIPTION

This site consists of two 150-gallon above-ground stainless-steel tanks which treat explosives containing wastewater. The treatment process consists of continuous settling of explosive solids in the tanks. Sodium hydroxide and aluminum powder are added to chemically reduce ("kill") the explosives in a batch process. Following the "kill" and settling of the solids, the clarified wastewater is discharged to the Winchester WWTF. The solids are removed from the tanks and transported to Site 1-11 for dewatering.

#### OPERATING UNITS

Two above-ground stainless-steel tanks.

#### DESCRIPTION OF HAZARDOUS WASTES TREATED

Wastewater containing explosives.

#### EMERGENCY ACTION

##### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS 100% BRASS.**

1. Personnel responding to a spill responsible for containment or clean up should don an acid suit, rubber gloves, and a plastic face shield before performing any clean-up activity.

2. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. The spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

B. Evacuation Procedures

If a release occurs which requires evacuation, the following evacuation routes shall be used:

Primary Evacuation Route

Leave building 209 at the north end doorway and continue to proceed east until several hundred feet away from building.

Alternate Evacuation Route

Leave building 209 at the north end doorway and continue to proceed west until several hundred feet away from building.

A map indicating evacuation routes is included as Figure 6.

C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to put out or control the fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately using the routes shown on Figure 6.

E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, repackaged, and sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENTS OF CONCERN: Lead and Barium

### 6.3.5 Rimfire Deprime Tank

Site Code: 1-6

Site Name: Rimfire Deprime Tank

Building No.: 25

Supervisor: T. Kessman

Phone No.: 2462

#### SITE DESCRIPTION

This site consists of a 180-gallon above-ground stainless-steel tank which treats explosives containing wastewater. After deprime operations have been completed, sodium hydroxide and aluminum powder are added to chemically reduce ("kill") the explosives in a batch process. Following the "kill" and settling of the solids, the clarified wastewater is discharged to the WWTF. The solids are removed from the tank and transported to Site 1-11 for dewatering.

#### OPERATING UNITS

One 180-gallon above-ground stainless-steel tank.

#### DESCRIPTION OF HAZARDOUS WASTES TREATED

Wastewater containing explosives.

#### EMERGENCY ACTION

##### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR  
CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS  
100% BRASS.**

1. Personnel responding to a spill responsible for containment or clean up should don rubber gloves and a plastic face shield before performing any clean-up activity.
2. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. The spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

B. Evacuation Procedures

If a release occurs which requires evacuation, the following evacuation routes shall be used:

Primary Evacuation Route

Leave building 25 at the north end doorway and continue to proceed east until several hundred feet away from building.

Alternate Evacuation Route

Leave building 25 at the north end doorway and continue to proceed west until several hundred feet away from building.

A map indicating evacuation routes is included as Figure 6.

C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to put out or control the fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately using the routes shown on Figure 6.

E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, repackaged, and sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENTS OF CONCERN: Lead and Barium

### 6.3.6 Central Machine Shop Chromate Reduction Unit

Site Code: 1-7

Site Name: Central Machine Shop Chromate Reduction Unit

Building No.: 246

Supervisor: L. Cline

Phone No.: 3064

#### SITE DESCRIPTION

This site consists of a 660-gallon above-ground fiberglass tank which continuously treats wastewater from a chrome plating operation. The treatment process consists of the addition of sulfuric acid and sodium metabisulfite to chemically reduce hexavalent chromium to trivalent chromium, then the addition of sodium hydroxide to regulate the effluent pH. The treated wastewater is discharged to the Winchester WWTF at Site 1-11.

#### OPERATING UNITS

One 660-gallon above-ground fiberglass tank.

#### DESCRIPTION OF HAZARDOUS WASTES TREATED

Wastewater containing hexavalent chromium.

#### EMERGENCY ACTION

##### A. Spills

1. Personnel responding to a spill responsible for containment or cleanup should don rubber gloves and a plastic face shield before performing any cleanup activity.
2. Spilled wastewater should be contained by secondary containment (180 gallon capacity), granular absorbent, absorbent booms or absorbent pads



prior to cleanup. The spilled material should be recovered and placed back in its original or similar container.

3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental services.

B. Evacuation Procedures

If the site supervisor determines that evacuation is necessary, utilize the routes shown on Figure 6.

C. Fires

Contact Fire Department at extension 2121. Use fire extinguishers or water hoses as necessary to put out or control the fire.

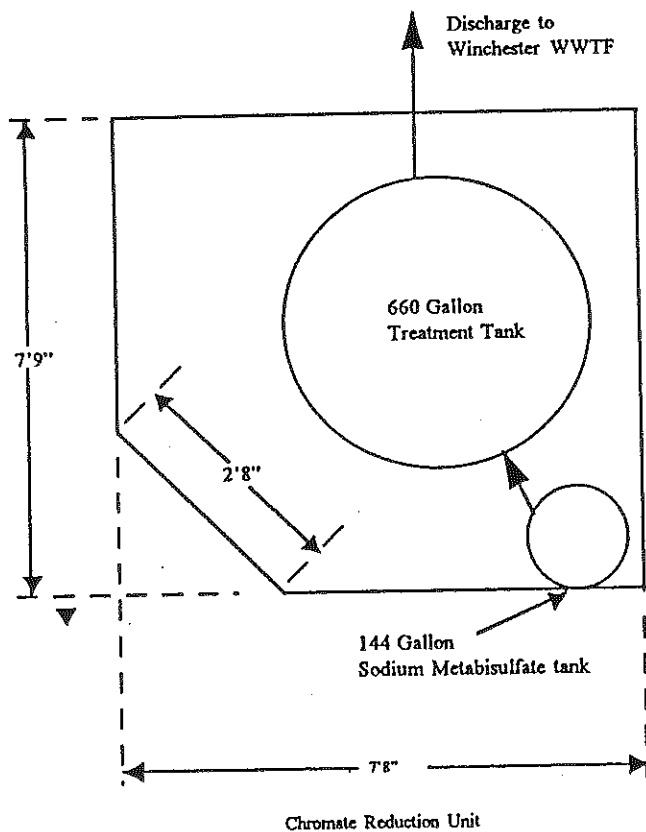
D. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

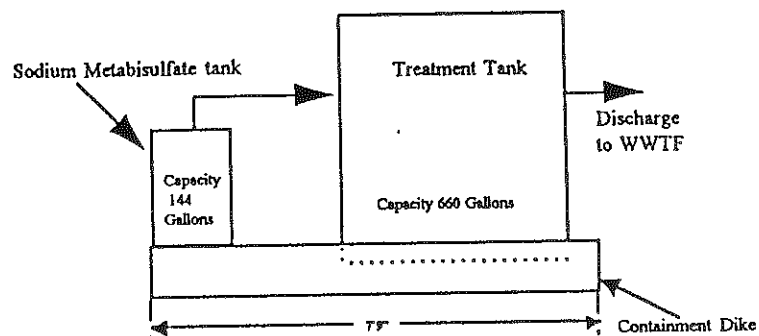
Spilled explosives will be recovered, repackaged, and sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be containerized for proper disposal.

WASTE CONSTITUENT OF CONCERN: Hexavalent Chromium



NOT TO SCALE



DRAWN BY: J.G.S. CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



SCHEMATIC 1-7

CHROMATE REDUCTION UNIT

JUNE 1995

### 6.3.7 Analytical Lab Spent Solvent Storage

Site Code: 1-9

Site Name: Analytical Lab Spent Solvent Storage

Building No.: N/A

Supervisor: D. Sheffield

Phone No.: 2501

#### SITE DESCRIPTION

This site consists of a 200-square feet storage area for spent solvents in 55-gallon steel drums. A maximum of 12 drums can be stored in this area. The drums are stored on one of three containment pans with grates which provide secondary containment for spill protection. Each containment pan holds approximately 76 gallons of material. Site 1-9 serves as an accumulation point. Containers are moved to the MRF for staging prior to shipment off-site for reclamation or disposal.

#### OPERATING UNITS

Storage area containing drums of spent solvents.

#### DESCRIPTION OF HAZARDOUS WASTES TREATED

Chlorinated and non-chlorinated spent solvents.

#### EMERGENCY ACTION

##### A. Spills

1. Personnel responding to a spill responsible for containment or cleanup should don rubber gloves and a plastic face shield before performing any cleanup activity.

2. Spilled solvent should be contained by granular absorbent, absorbent booms or absorbent pads prior to cleanup. The spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental services.

B. Evacuation Procedures

If the site supervisor determines that evacuation is necessary, utilize the routes shown on Figure 6.

C. Fires

Contact Fire Department at extension 2121. Use fire extinguishers or water hoses as necessary to put out or control the fire.

D. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled solvent will be desensitized, repackaged, and sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENTS OF CONCERN:

Chlorinated and non-chlorinated solvents.

### 6.3.8 Winchester WWTF Sludge Storage

Site Code: 1-11

Site Name: Winchester WWTF Sludge Storage

Regulatory Status: "90-Day" Storage

Building No.: 600

Supervisor: S. Goodman

Phone No.: 2975

#### SITE DESCRIPTION

The Winchester WWTF consists of a physical/chemical treatment process. Lime is used to adjust pH and form insoluble metal hydroxides. With the aid of polymers and ferrous chloride, the insoluble solids settle to form a sludge. The sludge is then thickened, dewatered, and placed into 15 cubic yard dumpsters. These dumpsters are routinely hauled to an off-site metals reclamation facility.

Treated sludge from explosive "kill" operations performed at Sites 1-3, 1-4, 1-5, 1-6, 4-4, 4-5a and 4-5b are transported to Site 1-11. The sludge is off-loaded into two sludge storage tanks as shown on the schematic following this section. Sludge from the tanks is dewatered in the Winchester WWTF plant filter press and the filtrate pumped back to the Winchester WWTF for treatment.

The sludge is listed as a F006 and K046 hazardous waste and is also characteristically hazardous for lead (D008).

Site 1-11 also includes the Zone 6 WWTF Emergency Holding Lagoon (Lagoon). The Lagoon is discussed in Section 5.2.3.

## OPERATING UNIT

Storage of Winchester WWTF sludge in roll-off containers.

## DESCRIPTION OF HAZARDOUS WASTES TREATED

Listed and characteristically hazardous wastewater treatment sludge.

## EMERGENCY ACTION

### A. Spill of Material From Container

Clean up spill with broom and shovel. Place spilled material back into appropriate container.

Any liquid from sludge will be contained with granular absorbent and placed in appropriate containers for disposal.

Contact Site Supervisor. Site Supervisor will contact Fire Department.

### B. Evacuation Procedures

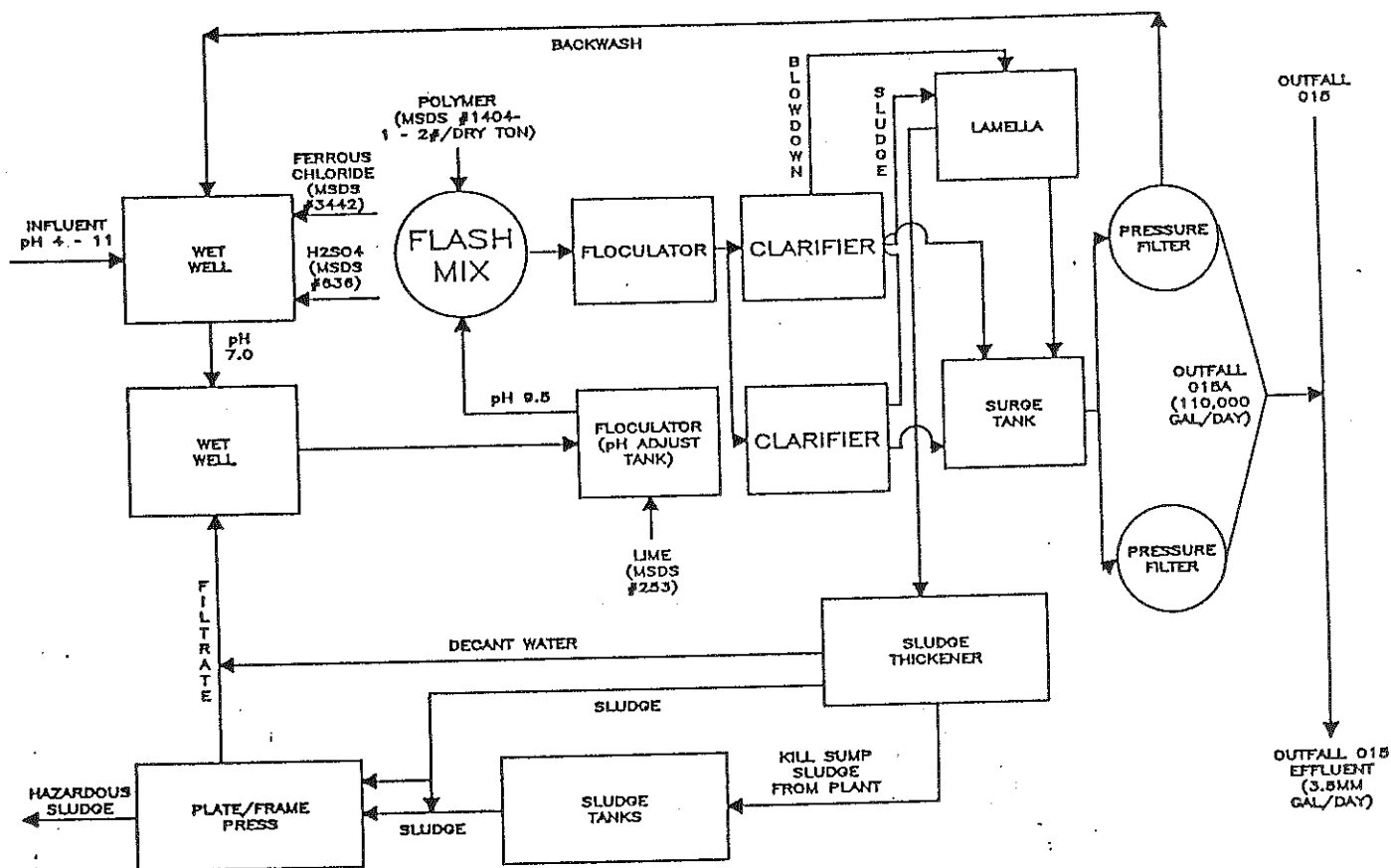
If the site supervisor determines that evacuation is necessary, utilize the routes shown on Figure 7.

### C. Fires

Contact Fire Department at extension 2121. Use fire extinguishers or water hoses as necessary to put out or control the fire.

WASTE CONSTITUENT OF CONCERN: Lead

# WINCHESTER WWTF



NOT TO SCALE

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



SCHEMATIC 1-11

WINCHESTER WWTF

JUNE 1995

### 6.3.9 Zone 1 Tumbling Media Storage

Site Code: 1-12

Site Name: Zone 1 Tumbling Media Storage

Building No.: N/A

Supervisor: K. Talley

Phone No.: 2482, 2471

#### SITE DESCRIPTION

This site consists of two van box storage trailers for the storage of tumbling media (ground corn cobs and walnut shells) contaminated with lead dust. The tumbling media is used to burnish the surface of ammunition and bullets. This Site is used only as needed. The tumbling media is treated at Site 1-19 as generated and typically does not require storage prior to treatment.

#### OPERATING UNITS

Two van box storage trailers.

#### DESCRIPTION OF HAZARDOUS WASTE STORED

Tumbling media (ground corn cobs and walnut shells) contaminated with lead dust.

#### EMERGENCY ACTION

##### A. Spill Material From Container

Clean up spill with broom and shovel. Place spilled material back into appropriate container.

Contact Site Supervisor. Site Supervisor will contact Environmental Services.



B. Evacuation Procedures

If the site supervisor determines that evacuation is necessary, utilize the routes shown on Figure 8.

C. Fires

This material will burn but will not readily self-ignite.

In case of fire, contact Olin Fire Department at extension 2121.

WASTE CONSTITUENTS OF CONCERN: Lead

### 6.3.10 Building 244, Tumbling Media Treatment

Site Code: 1-19

Site Name: Bullet Manufacturing Tumbling Media Treatment

Building No.: 244

Supervisor: D. Greeling

Phone No.: 2153

#### SITE DESCRIPTION

At this Site, tumbling media is treated in a container with triple super phosphate (TSP) to render it non-hazardous. The tumbling media consists of ground corn cobs and walnut shells contaminated with lead dust. The ground corn cobs and walnut shells are tumbled with ammunition and bullets in a rotary drum to burnish their surfaces. When the tumbling media can no longer be used, it is placed in a mixer with TSP and tumbled for a predetermined amount of time. The treated tumbling media is then placed in a one cubic yard box. When full, the box is dumped in a roll-off designated for this waste. Samples of the treated tumbling media have been analyzed for lead by the toxicity characteristic leaching procedure (TCLP) and found not to exhibit the hazardous characteristic of lead; confirmation sampling is done annually. The waste is then sent to a non-hazardous landfill.

#### OPERATING UNIT

Rotary mixer (3.3 cubic foot capacity).

#### DESCRIPTION OF HAZARDOUS WASTE TREATED

Tumbling media (ground corn cobs and walnut shells) contaminated with lead dust.

## EMERGENCY ACTION

### A. Spill Material From Container

Clean up spill with broom and shovel. Place spilled material back into appropriate container.

Contact Site Supervisor. Site Supervisor will immediately contact the Environmental Services Department in the event of a spill over one pound.

### B. Evacuation Procedures

If the site supervisor determines that evacuation is necessary, utilize the routes shown on Figure 9.

### C. Fires

This material will burn but will not readily self-ignite.

In case of fire, contact Olin Fire Department at extension 2121.

WASTE CONSTITUENT OF CONCERN: Lead

### 6.3.11 Shot Tower Lead Contaminated Oily Waste Storage

Site Code: 1-20

Site Name: Shot Tower Lead Contaminated Oily Waste Storage

Building No.: 335a

Supervisor: Web Simms

Phone No.: 3663

#### SITE DESCRIPTION

This Site consists of one metal two-cubic yard capacity container located outside on a concrete pad near the southeast corner of Building 335a. Oily waste (i.e. absorbent material, rags, PPE, and debris) which has become contaminated with lead from the shot tower operations is accumulated prior to disposal.

#### OPERATING UNITS

One metal two-cubic yard capacity container.

#### DESCRIPTION OF HAZARDOUS WASTE STORED

Oily waste material contaminated with lead.

#### EMERGENCY ACTION

##### A. Spill Material From Container

If material is spilled from a container, clean up with a broom and shovel. Place spilled material back into appropriate container. Contact Site Supervisor.

##### B. Evacuation Procedures

If the site supervisor determines that evacuation is necessary, utilize the routes shown on Figure 9.

C. Fires

Contact Fire Department at extension 2121. Use fire extinguishers or water hoses as necessary to put out or control the fire.

WASTE CONSTITUENT OF CONCERN: Lead

### 6.3.12 Zone 3 Incinerators

Site Code: 3-1

Site Name: Zone 3, Incinerators

Building No.: SS-300

Supervisor: R. Goodman

Alternate: L. Daniels

Phone No.: 2260

#### SITE DESCRIPTION

Site 3-1 consists of two identical hazardous waste incinerators, each with a waste heat boiler, and four "90-Day" units for collection of incinerator ash. The primary purpose of the incinerators is to burn combustible factory trash generated at the Facility, and occasionally, uncontaminated Type "O" Waste (as defined by Illinois solid waste regulations) from local off-site sources to produce steam. The second purpose of the incinerators is to burn explosive wastes (smokeless powder scrap, nitrocellulose scrap and priming mix scrap) and several nonhazardous wastes generated at the MPF.

Pollution control equipment for the incinerators includes two baghouses to control particulate air emissions. Dry lime is injected into the exhaust stream prior to the baghouses to coat the bags.

The units requiring RCRA Part B permits at Site 3-1 are described in Section 5 of this Plan.

#### OPERATING UNITS

Two hazardous waste incinerators.

Explosives waste storage building ("90-Day" storage).

Ash containers ("90-Day" storage).

Ash stabilization treatment unit ("90-Day" treatment).

Baghouse bags storage ("90-Day" storage).

## DESCRIPTION OF HAZARDOUS WASTE TREATED

The ash generated from incineration operations is considered hazardous for the characteristic of lead. The ash is placed in 1-cubic yard containers prior to being rendered non-hazardous by treating it with triple super phosphate in the ash stabilization treatment unit. Following treatment, the ash is placed in 15 cubic yard roll-off containers for disposal at a non-hazardous waste landfill. All ash is treated within 90 days of generation. The treatment unit is inspected daily. Additionally, baghouse bags are changed annually and are hazardous due to lead and cadmium. Baghouse bags are stored temporarily prior to on-site washing and incineration.

## DESCRIPTION OF HAZARDOUS WASTES STORED

Explosive wastes, processed in Site 4-2a, are stored in a temporary storage area within Site 3-1 prior to incineration. Descriptions of the explosive waste streams are provided below:

1. Smokeless powder scrap is generated at various locations within the MPF from small arms ammunition manufacturing. The waste is packaged at the MRF and placed into four-gallon plastic-lined polyethylene buckets which are filled with a minimum of one gallon of water and ethylene glycol (during the winter) and a maximum of 22 pounds of powder. Spic & Span is added to alleviate surface tension.
2. Priming mix scrap consists primarily of cloth rags and sponges that are contaminated with small quantities of priming mix. Priming mix is explosive, thereby rendering the waste hazardous. The rags and sponges are used to clean bowls, tools, and other manufacturing equipment in contact with priming mix. When the rags and sponges are worn out, they are put into four gallon plastic-lined polyethylene buckets which are filled with a minimum of one gallon of water, 250 grams of 50% sodium hydroxide solution, and ethylene glycol (during the winter).
3. Nitrocellulose scrap is generated from the manufacture of ejection cartridges. The waste is put into plastic-lined polyethylene buckets

which are then filled with a minimum of one gallon of water and ethylene glycol (during the winter).

## EMERGENCY ACTION

The Olin Health and Safety Program and site specific contingency procedures will be implemented immediately upon determination by the Site Supervisor that a condition exists which immediately threatens human health and the environment. The Olin Plant Fire Department and the Environmental Services Department will also be notified immediately to respond to the release and handle necessary reporting.

### A. Spill of Explosive Material

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE OR IGNITABLE WASTES UNLESS 100% BRASS.**

1. Prior to performing spill response activity, personnel shall don appropriate personal protective equipment.
2. If the entire contents of a container has spilled, the spill should first be contained with granular absorbent, absorbent booms, or absorbent pads.
3. If smokeless powder scrap or nitrocellulose scrap has been spilled, the liquid and solids should be wiped off of the floor with sponges or a disposable mop. The entire quantity of spilled material and clean up materials should be placed into buckets and incinerated.

If priming mix scrap has been spilled, the spillage should first be contained and then treated with a 25% ammonium acetate solution, so as to prevent crystallization of the priming mix. The remaining procedures to be followed are the same as those for smokeless powder.

4. For all spills contact the Site Supervisor. If necessary, the Site Supervisor will report the spill to Fire Department. In emergency situations, the Fire Department should be contacted directly.

### B. Spill of Incinerator Ash or Baghouse Dust

1. If incinerator ash or baghouse dust has been spilled, the spilled material should be scooped up and swept carefully so as not to raise



dust. The material should then be placed back into its original container.

2. For all spills contact the Site Supervisor. If necessary, the Site Supervisor will report the spill to the Fire Department. In emergency situations, the Fire Department should be contacted directly.

#### C. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should use the following evacuation routes and immediately contact the Site Supervisor:

##### Primary Evacuation Route

Leave Bldg. SS-300 at the north end doorway as shown on the Evacuation Plan (Figure 10) and proceed north to the assembly area near the guard house.

##### Alternate Evacuation Route

Leave Bldg. SS-300 at the east end doorway as shown on the Evacuation Plan (Figure 10) and proceed north to the assembly area near the guard house.

#### D. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and/or water hoses as necessary to extinguish or control the fire.

#### E. Potential of Explosion

A fire can cause deflagration of the explosive waste which in turn could create a fire in the incinerator building.

In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately as described in Subsection H below.

#### F. Emergency Equipment

- broom
- shovel; rubber dust pan
- coveralls
- steel-toed shoes

- hard hat
- safety glasses and plastic face shield
- rubber gloves and boots
- treatment chemicals to desensitize explosives (ammonium acetate)
- disposable mops; bucket; and sponges
- replacement combustible container
- cotton dust masks
- absorbal and/or absorbent pads

G. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material that results from a release, fire or explosion, will be properly treated on-site, or contained, packaged, and sent to an off-site hazardous waste facility.

All emergency clean-up equipment shall be decontaminated after use by washing or wiping clean. Any rinse water should be treated in the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

H. Health Hazards

Various wastes incinerated or generated at Zone 3 could contain hazardous substances. Heavy exposure including excessive absorption into the body must be avoided.

Explosive Waste: Deflagration caused by a source of heat or improper handling.

Lead Exposure: Chronic health hazard through ingestion, inhalation, and/or skin absorption.

### 6.3.13 Material Reclamation Facility

Site Code: 4-2a

Site Name: Material Reclamation Facility General Hazardous Waste Storage

Building No.: N/A

Supervisor: K. Talley

Alternate: L. Wadlow

Phone No.: 2482, 2471

#### SITE DESCRIPTION

The Material Reclamation Facility (MRF) consists of three acres for the storage of hazardous wastes. Also, the Site includes a Part B permitted storage building for mercury contaminated debris and ammunition (See Section 5.2.2).

This Site is routinely used as a staging area for hazardous wastes so that quantities can be accumulated for on-site treatment or off-site disposal within 90 days of generation. Specific storage areas have been designated for liquid and solid wastes.

#### OPERATING UNITS

Spent solvent storage pad

Van box trailers

General hazardous waste storage areas

Stage 3 kill sump

## DESCRIPTION OF HAZARDOUS WASTE STORED

### A. Various explosive containing wastes

1. Smokeless powder scrap is generated at various locations within the MPF as a result of small arms ammunition manufacturing. The waste is placed into a four-gallon plastic lined polyethylene bucket which is filled with a minimum of one gallon of water and ethylene glycol (during the winter) and a maximum of 22 pounds of powder Spic and Span is added to alleviate surface tension.
2. Priming mix scrap consists of cloth rags and sponges that are contaminated with very small quantities of priming mix. Priming mix is the explosive component within this waste that classifies it as hazardous. The rags and sponges are used to clean bowls, tools, and other manufacturing equipment in contact with priming mix. When the rags and sponges are worn out, they are put into four-gallon plastic-lined polyethylene buckets which are then filled with a minimum of one gallon of water and 250 grams of 50% sodium hydroxide pellets and ethylene glycol (during the winter).
3. Nitrocellulose scrap is generated as a result of the manufacture of ejection cartridges. The waste is put into plastic lined polyethylene buckets which are then filled with a minimum of one gallon of water and ethylene glycol (during the winter).

### B. Solvent Wastes

Chlorinated and non-chlorinated spent solvent wastes are generated from metal degreasing operations and from waterproofing materials used in small arms ammunition manufacturing. These wastes are sent to the MRF for up to 90 days from the accumulation start date or until truckload quantities are accumulated. At that time, the waste is sent to an off-site solvent reclamation facility.

### C. Other Hazardous Wastes

Other hazardous wastes, as described in Section 4.3.2, may be stored as necessary and permitted at the MRF.

## EMERGENCY ACTION

### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS 100% BRASS.**

1. Personnel responding to spill responsible for containment or cleanup should don rubber gloves and a plastic face shield before performing any clean-up activity.
2. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. All the spilled material should be recovered and placed back in its original or similar container.

### B. Spill of Solid Material from Container

Immediately contact the Site Supervisor. Clean up spill with broom and shovel. Place spilled material back into appropriate containers. The Site Supervisor will contact the Fire Department and Environmental Services.

### C. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should evacuate through the closest safe exit and contact the Site Supervisor. Evacuation routes are shown on Figure 11.

### D. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to put out or control the fire.

### E. Potential of Explosion

A fire can cause deflagration of the explosive waste which in turn could involve other wastes managed at the Facility.

In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately.

F. Emergency Equipment

- gloves
- coveralls
- overpack drums
- shovels
- brooms
- safety glasses
- steel-toed shoes

G. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material that results from a release, fire or explosion, will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, repackaged, and sent to the Zone 3 for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

H. Health Hazards

Explosive Waste: Deflagration caused by source of heat or improper handling.

Solvents: May be fatal if inhaled, swallowed, or absorbed through skin. Vapors may cause suffocation. Contact may irritate or burn skin and eyes. Fire may produce irritating or poisonous gases.

Toxic Wastes: Various wastes stored at the MRF contain lead, cadmium, arsenic, mercury, and other toxic substances. Heavy exposure, including excessive absorption in the body, must be avoided.

WASTE CONSTITUENT OF CONCERN: Lead

#### 6.3.14 R & D Explosive Sumps

Site Code: 4-4

Site Name: Research and Development Explosive Sumps

Building No.: T-189

Supervisor: G. Mei

Phone No.: 2650

#### SITE DESCRIPTION

This site consists of three in-ground concrete sumps which collect explosive residues from wastewater generated at the high explosives laboratory, primer laboratory, and the research and development mix house by settling. The wastewater, following settling of the explosive residues is discharged to the Winchester WWTF. The explosive residues in the sumps are "killed" annually by adding sodium hydroxide and aluminum powder to chemically reduce the explosives. The treated residues are then flushed to the Winchester WWTF.

#### OPERATING UNITS

Three in-ground concrete sumps.

#### DESCRIPTION OF HAZARDOUS WASTE TREATED

Wastewater containing explosives.

## EMERGENCY ACTION

### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS 100% BRASS.**

1. Personnel responding to spill responsible for containment or cleanup should don rubber gloves and a plastic face shield before performing any clean-up activity.
2. Cut off wastewater flow.
3. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. All the spilled material should be recovered and placed back in its original or similar container.
4. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

### B. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should evacuate through the closest safe exit and contact the Site Supervisor. Evacuation routes are shown on Figure 12.

### C. Fires

Contact Olin Fire Department at extension 2121. Use fire extinguishers and water hoses as necessary to put out or control the fire.

### D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. In the event of a fire that cannot be easily extinguished, personnel who are in the building should evacuate immediately utilizing the routes shown on Figure 12.



E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, repackaged, and sent to the MRF for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENT OF CONCERN: Lead

### 6.3.15 High Explosives "Kill" Sump T-242

Site Code: 4-5a

Site Name: High Explosives "Kill" Sump

Building No.: T-242

Supervisor: A. W. Moore

Phone No.: 2576

#### SITE DESCRIPTION

This Site consists of a 4,000-gallon in-ground stainless-steel sump which treats explosives containing wastewater. The treatment process consists of continuous settling of explosive solids in the tank. Sodium hydroxide and aluminum powder are added to chemically reduce ("kill") the explosives in a batch process. Following the "kill" and settling of the solids, the clarified wastewater is discharged to the Winchester WWTF. The solids are removed from the sump and transported to Site 1-11 for dewatering.

#### OPERATING UNIT

4,000-gallon stainless-steel sump.

#### DESCRIPTION OF HAZARDOUS WASTE TREATED

Explosive contaminated wastewater.

#### EMERGENCY ACTION

##### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS NON-SPARKING.**

1. Personnel responding to a spill responsible for containment or cleanup should don appropriate PPE rubber gloves and a plastic face shield before performing any clean-up activity.

2. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. All the spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

B. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should evacuate through the closest safe exit and contact the Site Supervisor. Evacuation routes are shown on Figure 13.

C. Fires

Contact Olin Fire Department at extension 2121. Evacuate in the event of fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. Personnel who are in the building should evacuate immediately utilizing the routes shown on Figure 13.

E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, placed in sump, and saturated soil and wood sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENT OF CONCERN: Lead

### 6.3.16 T-144 "Kill" Tank

Site Code: 4-5b

Site Name: T-144 "Kill" Tank

Building No.: T-144

Supervisor: A. W. Moore

Phone No.: 2576

#### SITE DESCRIPTION

This site consists of a 150-gallon in-ground stainless-steel tank which treats explosives containing wastewater. The treatment process consists of continuous settling of explosive solids in the tank. Sodium hydroxide and aluminum powder are added to chemically reduce ("kill") the explosives in a batch process. Following the "kill" and settling of the solids, the clarified wastewater is discharged to the WWTF. The solids are removed from the sump and transported to Site 1-11 for dewatering.

#### OPERATING UNIT

150-gallon stainless-steel tank.

#### DESCRIPTION OF HAZARDOUS WASTE TREATED

Wastewater containing explosives.

#### EMERGENCY ACTION

##### A. Spill of Explosive or Ignitable Wastes

**NOTE: DO NOT USE METALLIC EQUIPMENT FOR CONTAINMENT OR CLEAN-UP OF EXPLOSIVE WASTE UNLESS NON-SPARKING.**

1. Personnel responding to a spill responsible for containment or cleanup should don appropriate PPE rubber gloves and a plastic face shield before performing any clean-up activity.

2. The spill should be contained with granular absorbent, absorbent booms, or absorbent pads prior to clean-up. All the spilled material should be recovered and placed back in its original or similar container.
3. Immediately contact the Site Supervisor. The Site Supervisor will contact the Fire Department and Environmental Services.

B. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should evacuate through the closest safe exit and contact the Site Supervisor. Evacuation routes are shown on Figure 13.

C. Fires

Contact Olin Fire Department at extension 2121. Evacuate in the event of the fire.

D. Potential of Explosion

A fire can cause deflagration of the explosive waste which could in turn involve other wastes managed at the Facility. Personnel who are in the building should evacuate immediately utilizing the routes shown on Figure 13.

E. Storage and Treatment of Released Material

After an emergency situation has ended, any recovered material will be properly treated on-site, or contained and stored, then sent to an off-site hazardous waste facility.

Spilled explosives will be desensitized, placed in sump, and saturated soil and wood sent to the Material Reclamation Facility for preparation for incineration.

All emergency clean-up equipment should be decontaminated after use by washing or wiping clean. Any wash water should be treated by the Winchester WWTF and any soiled or contaminated wipes should be incinerated.

WASTE CONSTITUENT OF CONCERN: Lead

### 6.3.17 Centerfire Tumbling Media Treatment

Site Code: 4-10

Site Name: Centerfire Tumbling Media Treatment

Building No.: T-500

Supervisor: S. Brunaugh

Phone No.: 2022

#### SITE DESCRIPTION

At this Site, tumbling media is treated in a container with triple super phosphate (TSP) to render it non-hazardous. The tumbling media consists of ground corn cobs and walnut shells contaminated with lead dust. The ground corn cobs and walnut shells are tumbled with ammunition and bullets in a rotary drum to burnish their surfaces. When the tumbling media can no longer be used, it is placed in a mixer with TSP and tumbled for a predetermined amount of time. The treated tumbling media is then placed in a one cubic yard box. When full, the box is dumped in a roll-off designated for this waste. Samples of the treated tumbling media have been analyzed for lead by toxicity characteristic leaching procedure (TCLP) and found not to exhibit the hazardous characteristic of lead; confirmation sampling is done annually. The waste is then sent to a non-hazardous landfill.

#### OPERATING UNIT

Rotary mixer (3.3 cubic foot capacity).

#### DESCRIPTION OF HAZARDOUS WASTE TREATED

Tumbling media (ground corn cobs and walnut shells) contaminated with lead dust.

## EMERGENCY ACTION

### A. Spill Material From Container

Clean up spill with broom and shovel. Place spilled material back into appropriate container.

Contact Site Supervisor. Site Supervisor will immediately contact the Olin Fire Department and the Environmental Services Department in the event of a spill over one pound.

### B. Evacuation Procedures

If the Site Supervisor determines that evacuation is necessary, utilize the routes shown on Figure 14.

### C. Fires

This material will burn but will not readily self-ignite. In case of fire, contact Olin Fire Department at extension 2121.

WASTE CONSTITUENT OF CONCERN: Lead

### 6.3.18 Casting Plant Baghouse Bags/Dark Baghouse Dust Storage

Site Code: 17-3

Site Name: Casting Plant Discarded Baghouse Bags/Dark Baghouse Dust Storage

Building No.: N/A

Supervisor: R. Basarich

Phone No.: 5749

#### SITE DESCRIPTION

This site consists of approximately 2,160 square feet of area for the storage of discarded baghouse bags and dark baghouse dust.

The discarded bags are generated by the routine replacement of fabric filtering bags used in four baghouses to capture furnace particulate emissions from the casting operation. These bags are a characteristically hazardous waste for cadmium (D006). After the bags are removed from the baghouse, they are placed in 1 yd<sup>3</sup> cardboard containers. The discarded bags are stored at Site 17-3 for less than 90 days until they are washed to render them nonhazardous. The nonhazardous bags are then sent to Zone 3 for incineration.

Baghouse dust is collected in fabric sacks which are attached to the underside of the baghouses. When the sack is removed from the baghouse, the operator will determine, based on color, if the dust will be managed as a hazardous waste. Baghouse dust generated from the casting operation is a characteristically hazardous waste for cadmium (D006). Only the baghouse dust which has been determined to be too dark for use as a raw material substitute is managed as a hazardous waste. The sacks containing dark baghouse dust are stored at Site 17-3 for less than 90 days prior to off-site reclamation.

#### OPERATING UNIT

Hazardous waste storage area.



### DESCRIPTION OF HAZARDOUS WASTE STORED

- A. Baghouse bags containing cadmium.
- B. Dark baghouse dust containing cadmium.

### EMERGENCY ACTION

#### A. Spill From Container

Clean up with broom and shovel. Place spilled material in appropriate container. Do not inhale or ingest dust or allow skin contact.

#### B. Evacuation Routes

In the event of a fire or other emergency requiring evacuation, site personnel should evacuate through the closest safe exit and contact the Site Supervisor.

#### C. Fires

This material will smolder but will not readily self-ignite. In case of fire, call the Olin Fire Department at extension 2121.

WASTE CONSTITUENT OF CONCERN: Cadmium

# TABLES



**TABLE 1: DESCRIPTION OF ZONES WITHIN MAIN PLANT FACILITY**

ZONE	DESCRIPTION OF ACTIVITIES	ACREAGE
1	Major manufacturing areas for Brass and Winchester Divisions	63
2	Wad Manufacturing, Winchester Division combined with Zone 3	192
3	Main Plant Facility Power House and Incinerator (Zone 3)	Included in Zone 2
4	Centerfire and Shotshell Mfg., High Explosives Mfg., Distribution Center, Material Reclamation Facility, Winchester Division	192
5	Magazine Storage for Explosives, Winchester Division	423
6	Non-Hazardous (Brass & Winchester) and Hazardous (Winchester) Wastewater Treatment Facilities	48
7	Water Filtration Plant and Shipping Services, Brass Division	17
14	Employee's Clubhouse and Picnic Grounds	100
15	Employee's Trap and Skeet Club	211
		26
	Railroad Property (between Zone 7 and Illinois Hwy. 140) (No Activities)	
	TOTAL	1,272

→

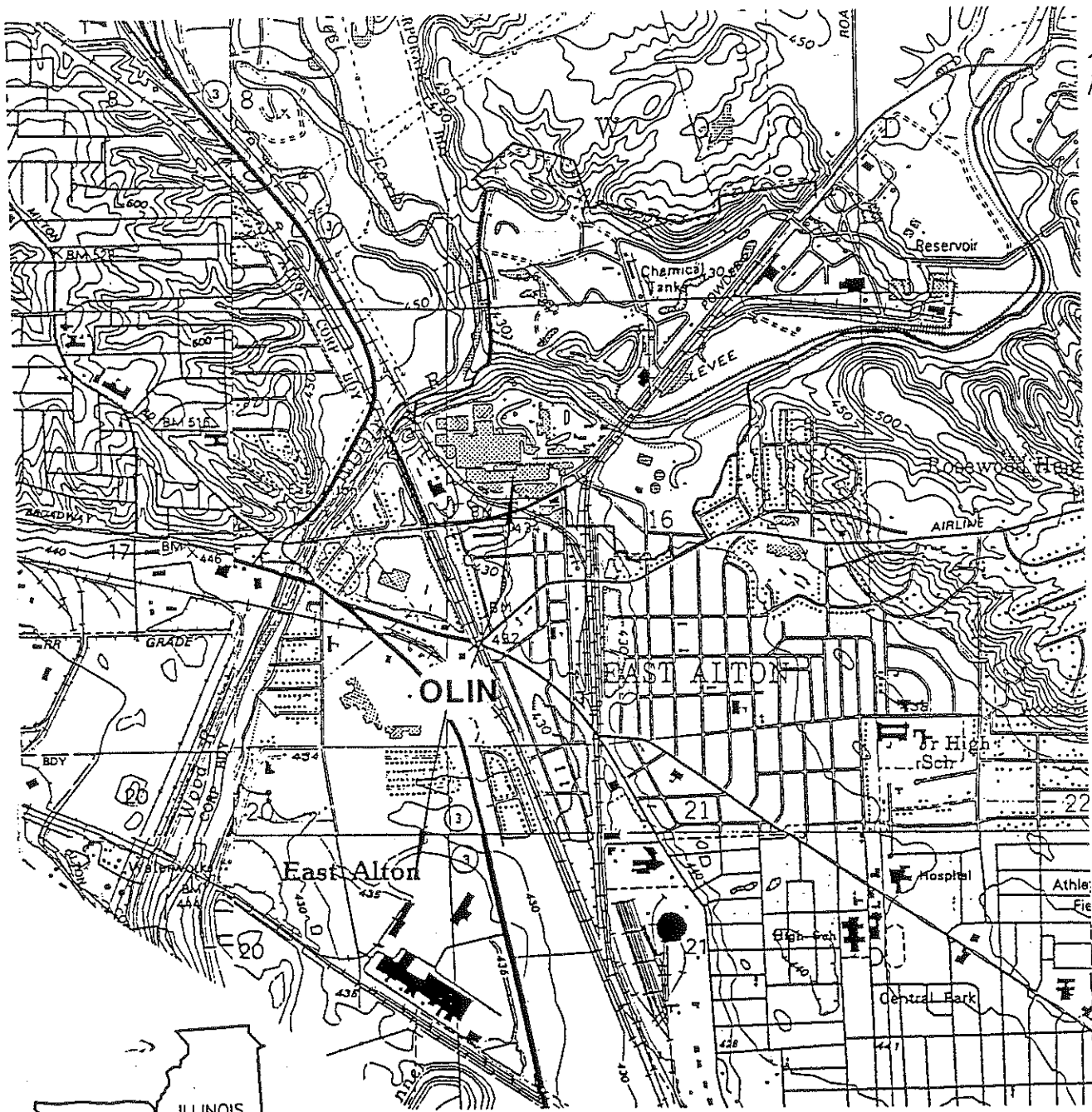


## FIGURES

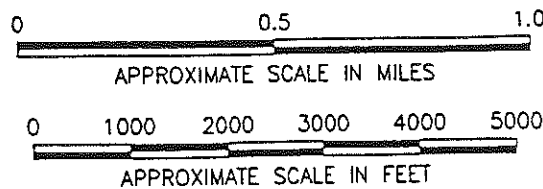


**SOURCE:**

U.S. Geological Survey  
 Alton, ILL.-MO. Quadrangle 1994, Betholo, ILL. Quadrangle (1954) Revised 1993,  
 Columbia Bottom, MO.-ILL. Quadrangle 1994 & Wood River, ILL.-MO. Quadrangle 1994  
 7.5 Minute Series (Topographic)



QUADRANGLE LOCATION



DRAWN BY: S.C.C. II CHECKED BY: J.G.S.

Prepared For:

OLIN  
 EAST ALTON, ILLINOIS  
 RCRA CONTINGENCY PLAN

Prepared By:

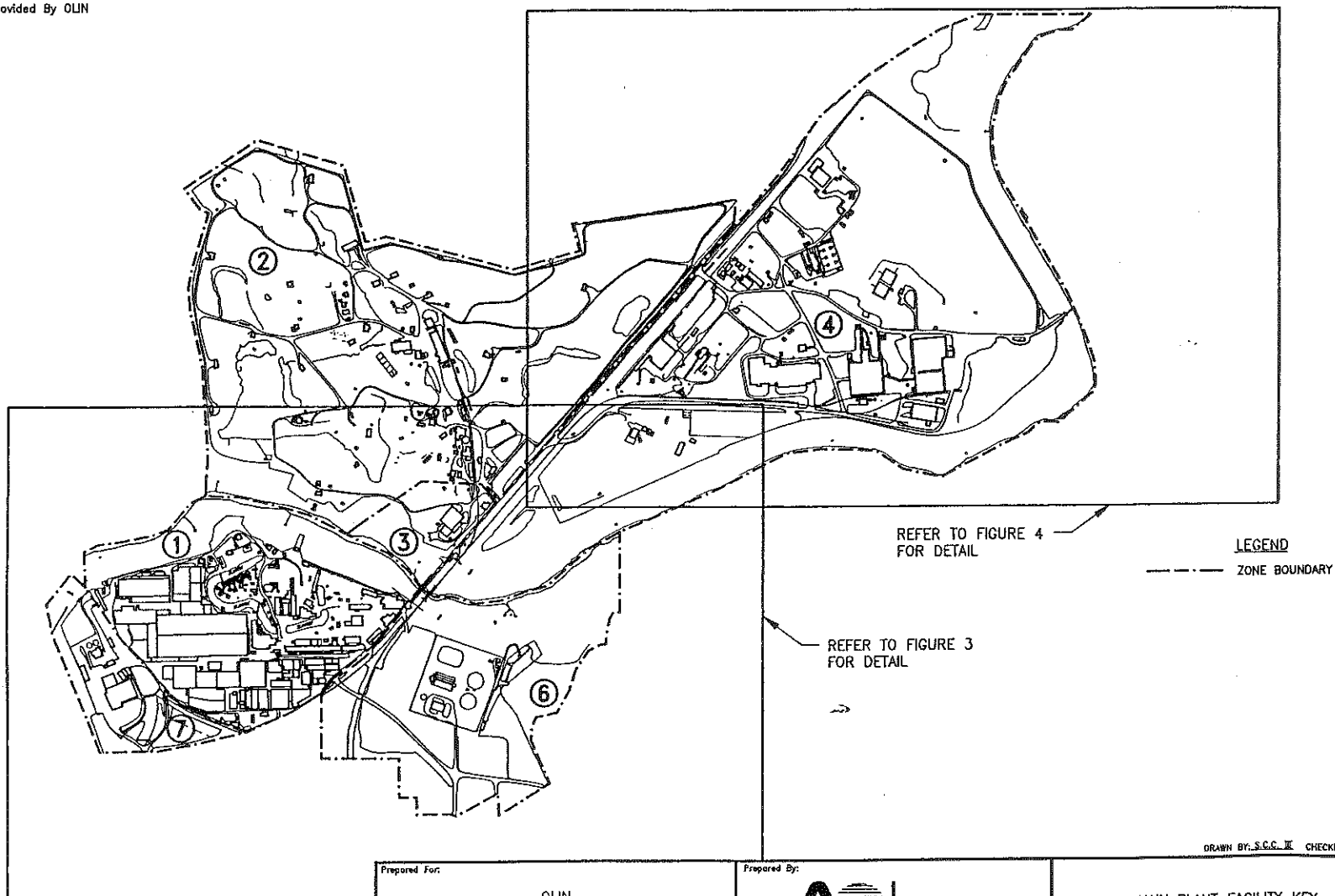


SITE LOCATION MAP

AUGUST 1995

FIGURE 1

SOURCE:  
Base Map Provided By OLIN



400 200 0 400 800  
SCALE IN FEET

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



DRAWN BY: S.C.C. II CHECKED BY: J.C.S.

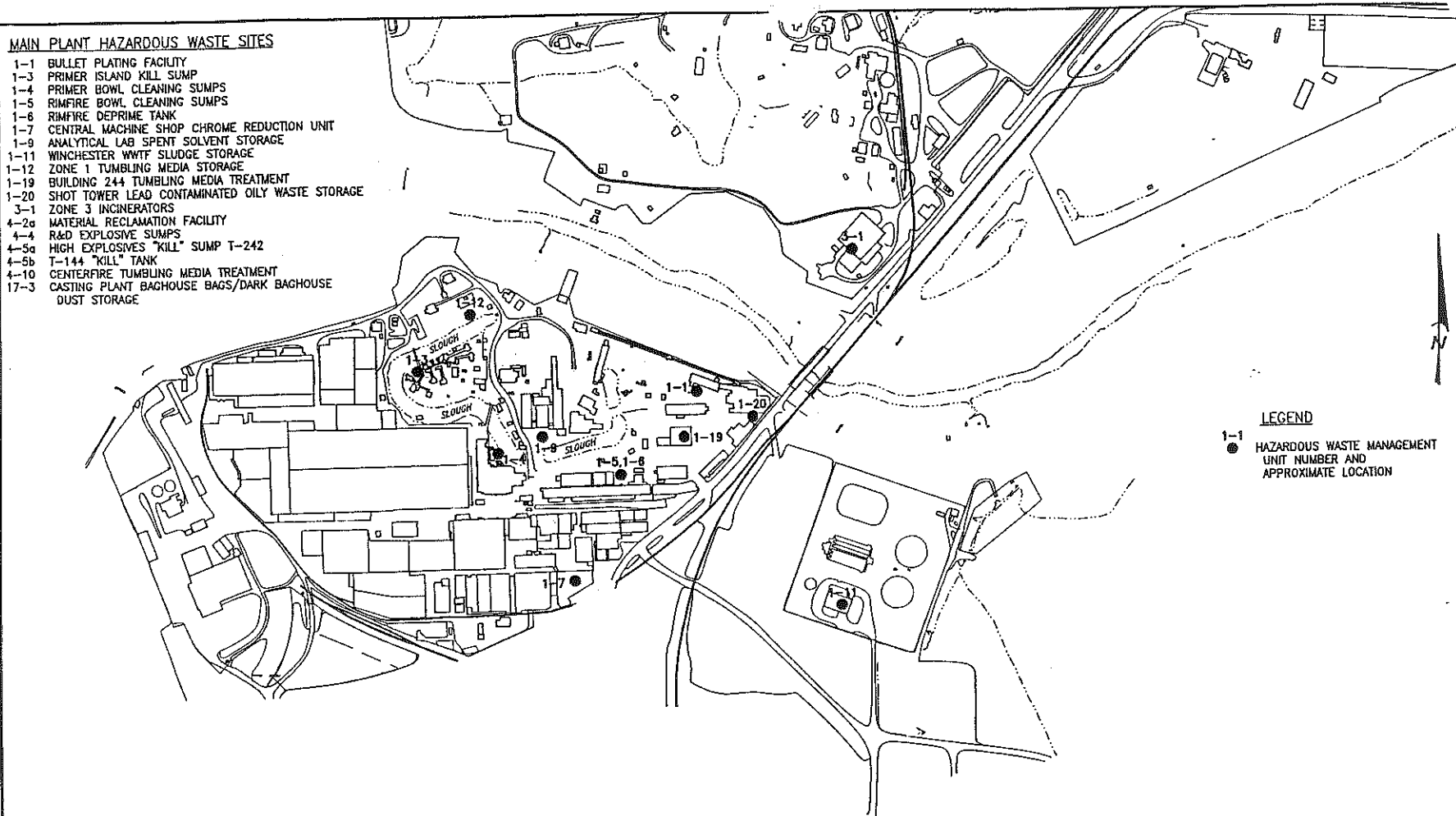
MAIN PLANT FACILITY KEY

AUGUST 1995

FIGURE 2

# MAIN PLANT HAZARDOUS WASTE SITES

- 1-1 BULLET PLATING FACILITY
- 1-3 PRIMER ISLAND KILL SUMP
- 1-4 PRIMER BOWL CLEANING SUMPS
- 1-5 RIMFIRE BOWL CLEANING SUMPS
- 1-6 RIMFIRE DEPRIME TANK
- 1-7 CENTRAL MACHINE SHOP CHROME REDUCTION UNIT
- 1-9 ANALYTICAL LAB SPENT SOLVENT STORAGE
- 1-11 WINCHESTER WHITE SLUDGE STORAGE
- 1-12 ZONE 1 TUMBLING MEDIA STORAGE
- 1-19 BUILDING 244 TUMBLING MEDIA TREATMENT
- 1-20 SHOT TOWER LEAD CONTAMINATED OILY WASTE STORAGE
- 3-1 ZONE 3 INCINERATORS
- 4-2a MATERIAL RECLAMATION FACILITY
- 4-4 R&D EXPLOSIVE SUMPS
- 4-5a HIGH EXPLOSIVES "KILL" SUMP T-242
- 4-5b T-144 "KILL" TANK
- 4-10 CENTERFIRE TUMBLING MEDIA TREATMENT
- 17-3 CASTING PLANT BAGHOUSE BAGS/DARK BAGHOUSE DUST STORAGE



## LEGEND

- 1-1 HAZARDOUS WASTE MANAGEMENT UNIT NUMBER AND APPROXIMATE LOCATION

DRAWN BY: S.C.G. III CHECKED BY: J.G.S.

200 100 0 200 400  
SCALE IN FEET

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



HAZARDOUS WASTE MANAGEMENT UNITS

AUGUST 1995

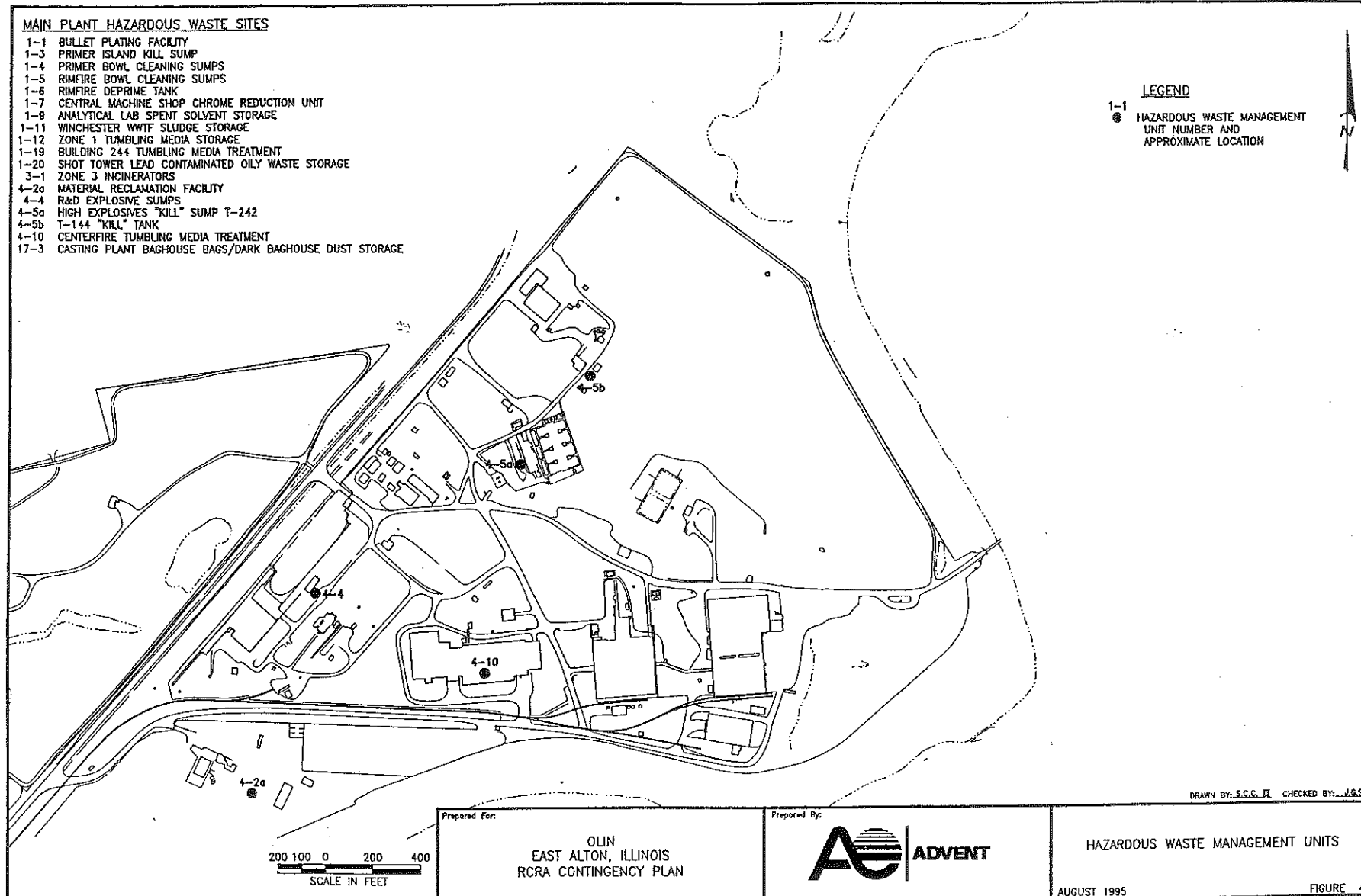
FIGURE 3

# MAIN PLANT HAZARDOUS WASTE SITES

- 1-1 BULLET PLATING FACILITY
- 1-3 PRIMER ISLAND KILL SUMP
- 1-4 PRIMER BOWL CLEANING SUMPS
- 1-5 RIMFIRE BOWL CLEANING SUMPS
- 1-6 RIMFIRE DEPRIME TANK
- 1-7 CENTRAL MACHINE SHOP CHROME REDUCTION UNIT
- 1-9 ANALYTICAL LAB SPENT SOLVENT STORAGE
- 1-11 WINCHESTER WWTF SLUDGE STORAGE
- 1-12 ZONE 1 TUMBLING MEDIA STORAGE
- 1-19 BUILDING 244 TUMBLING MEDIA TREATMENT
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- 4-5b T-144 "KILL" TANK
- 4-10 CENTERFIRE TUMBLING MEDIA TREATMENT
- 17-3 CASTING PLANT BAGHOUSE BAGS/DARK BAGHOUSE DUST STORAGE

## LEGEND

- 1-1 ● HAZARDOUS WASTE MANAGEMENT UNIT NUMBER AND APPROXIMATE LOCATION



DRAWN BY: S.G.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:

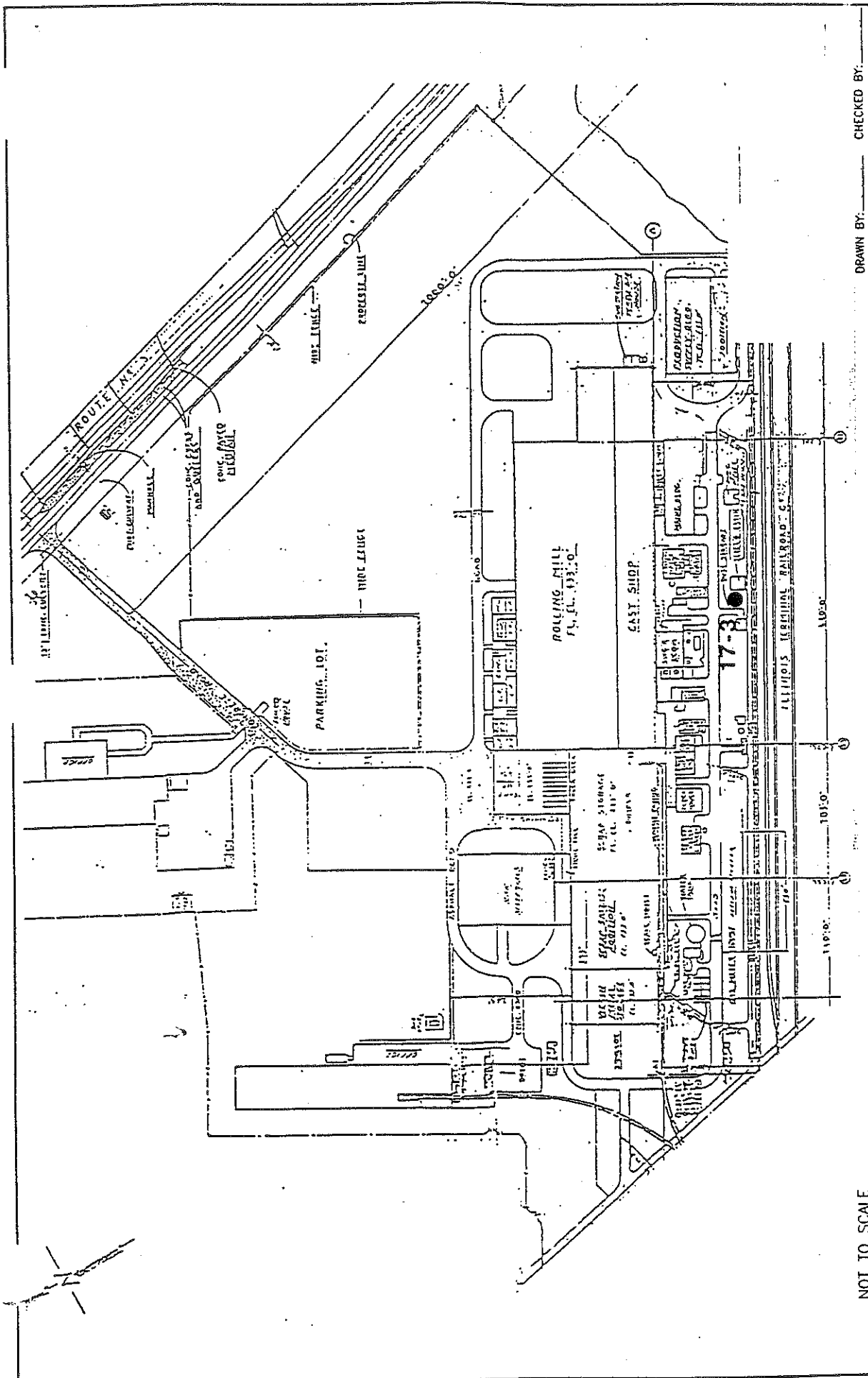


HAZARDOUS WASTE MANAGEMENT UNITS

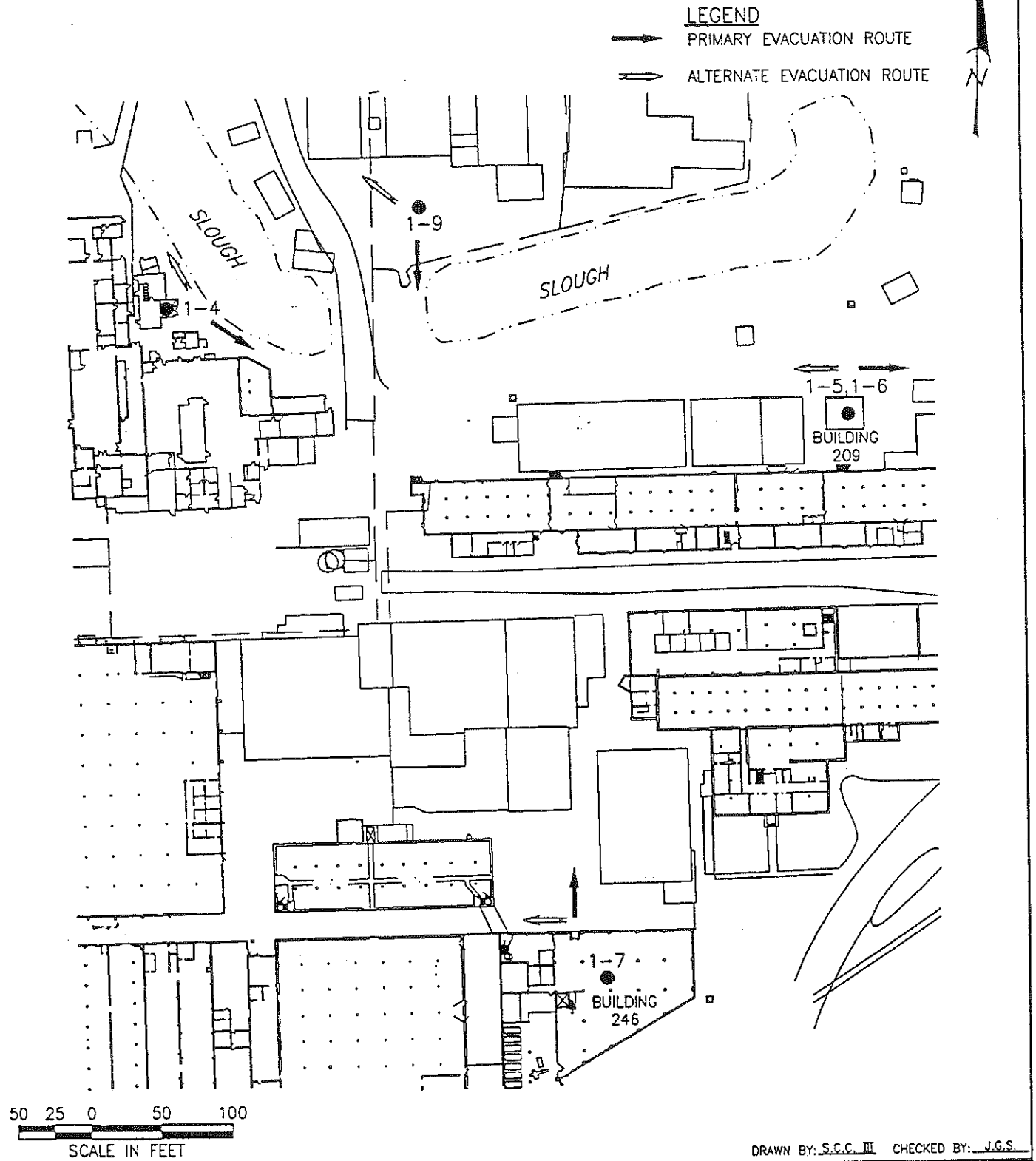
AUGUST 1995

FIGURE 4





SOURCE:  
Base Map Provided By OLIN



Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



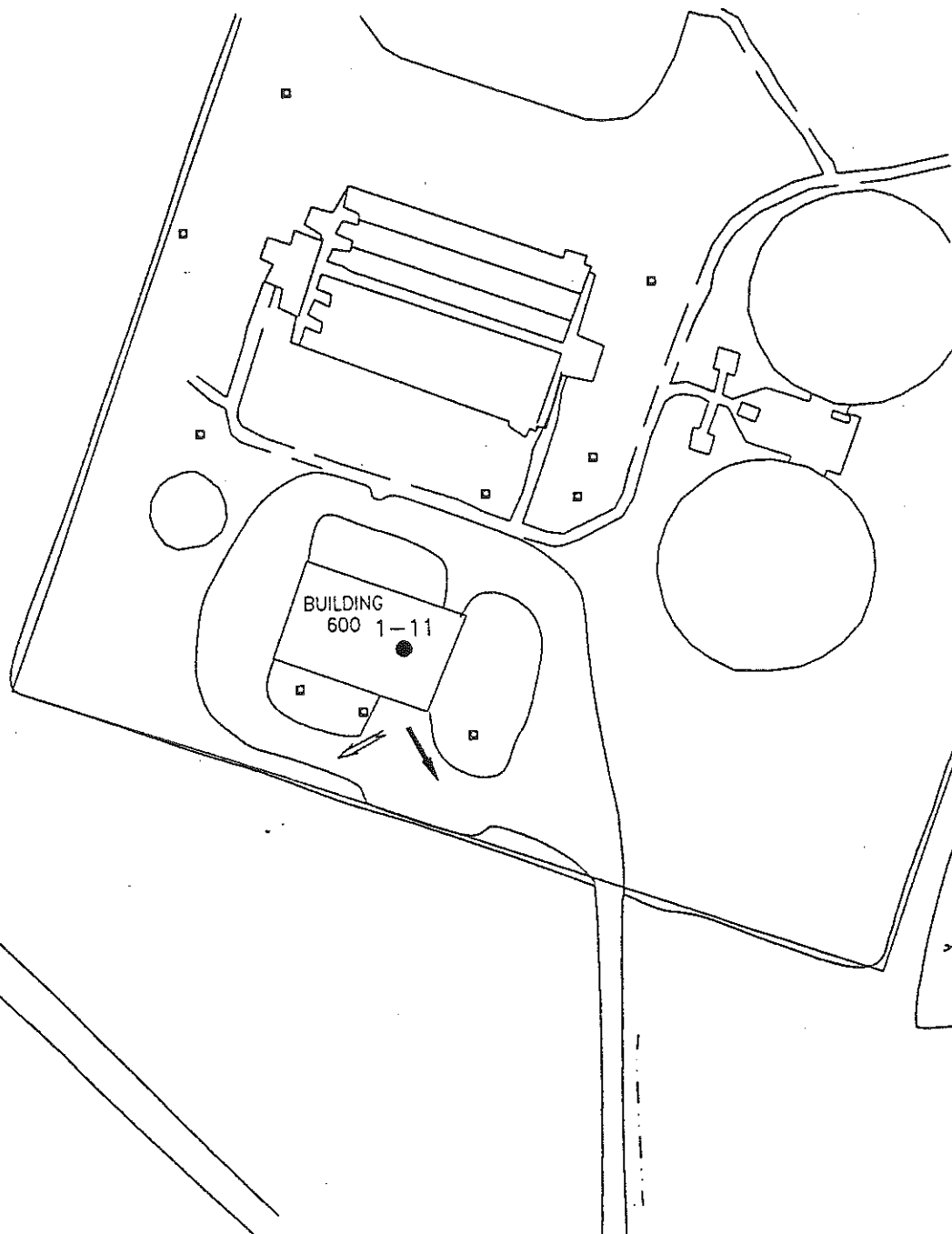
GENERAL EVACUATION PLAN FOR  
HWMUs 1-4, 1-5, 1-6, 1-7, 1-9

AUGUST 1995

FIGURE 6

SOURCE:  
Base Map Provided By OLIN

**LEGEND**  
→ PRIMARY EVACUATION ROUTE  
⇨ ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



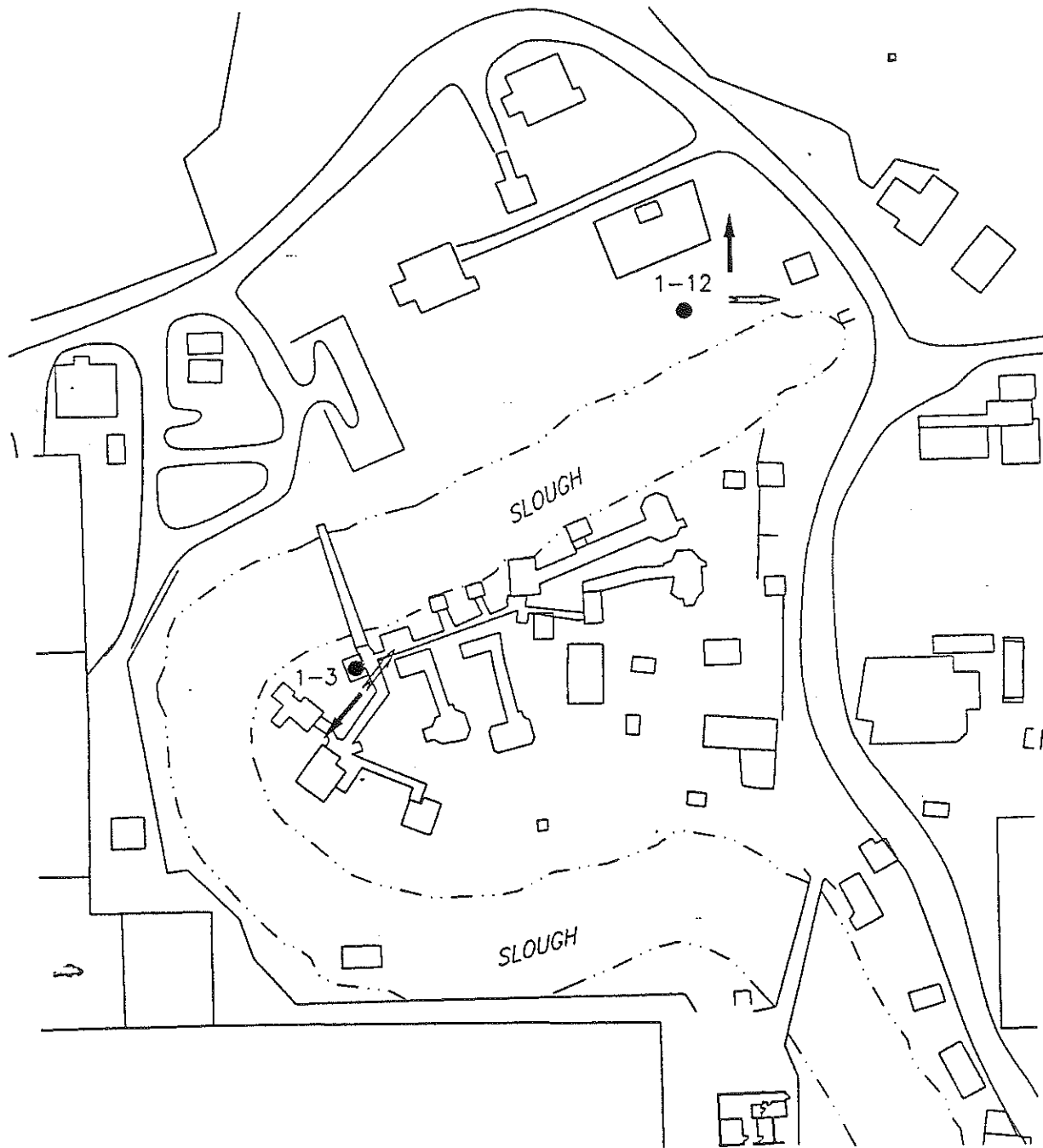
GENERAL EVACUATION PLAN FOR  
HWMU 1-11

AUGUST 1995

FIGURE 7

SOURCE:  
Base Map Provided By OLIN

**LEGEND**  
→ PRIMARY EVACUATION ROUTE  
⇌ ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:





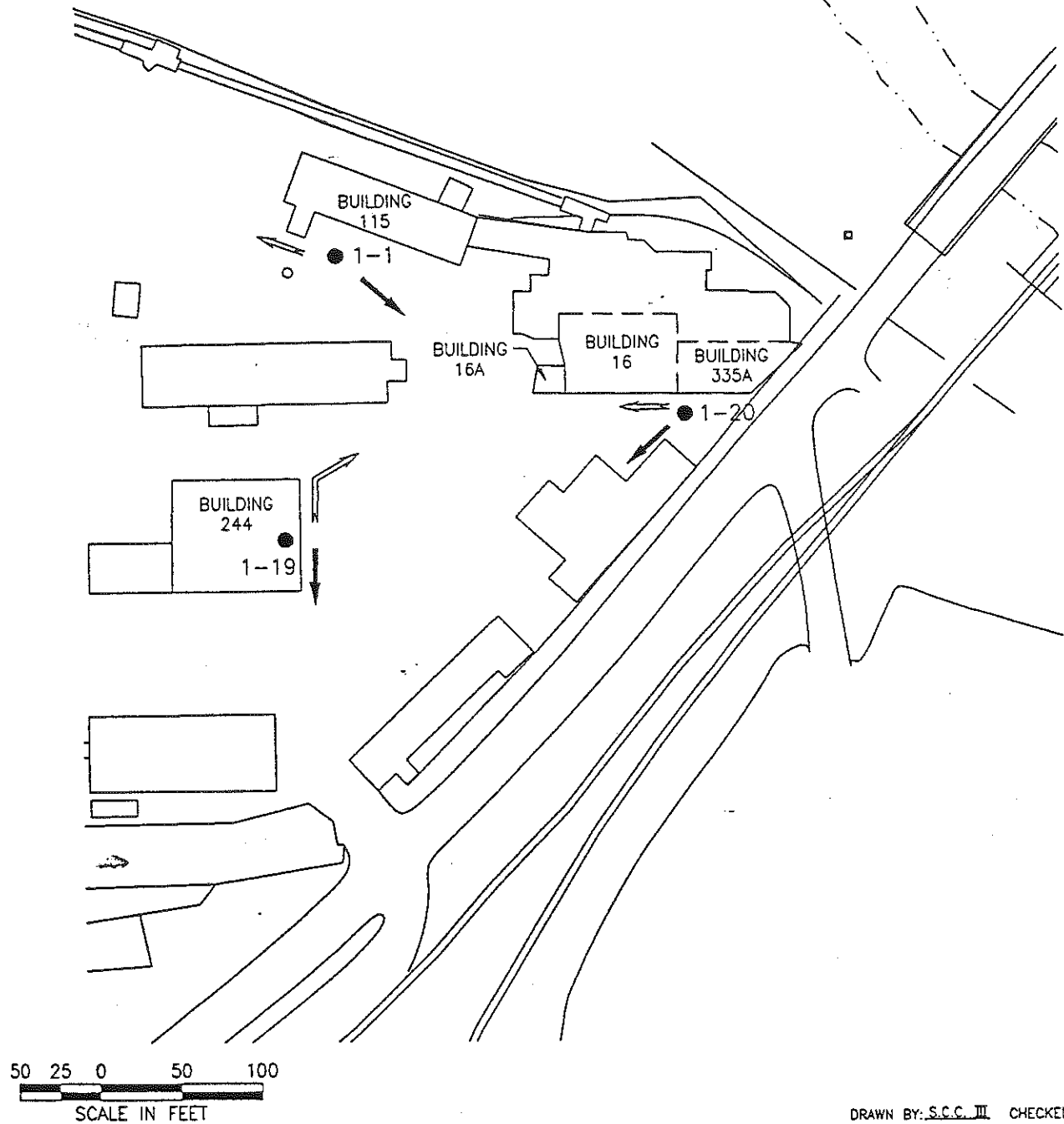
GENERAL EVACUATION PLAN FOR  
HWMUs 1-3, 1-12

AUGUST 1995

FIGURE 8

SOURCE:  
Base Map Provided By OLIN

**LEGEND**  
 PRIMARY EVACUATION ROUTE  
 ALTERNATE EVACUATION ROUTE



DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:

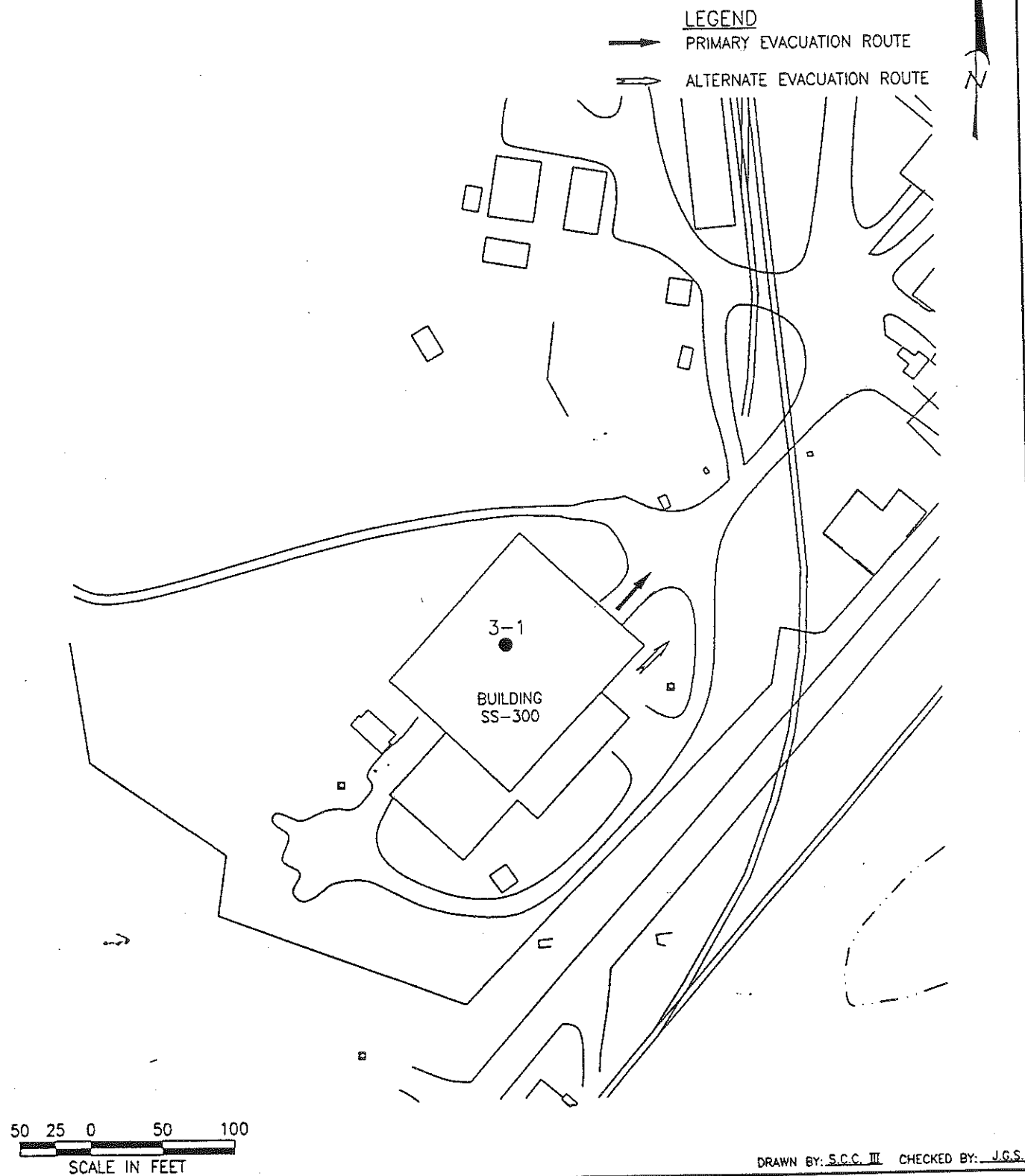


GENERAL EVACUATION PLAN FOR  
HWMUs 1-1, 1-19, 1-20

AUGUST 1995

FIGURE 9

SOURCE:  
Base Map Provided By OLIN



Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



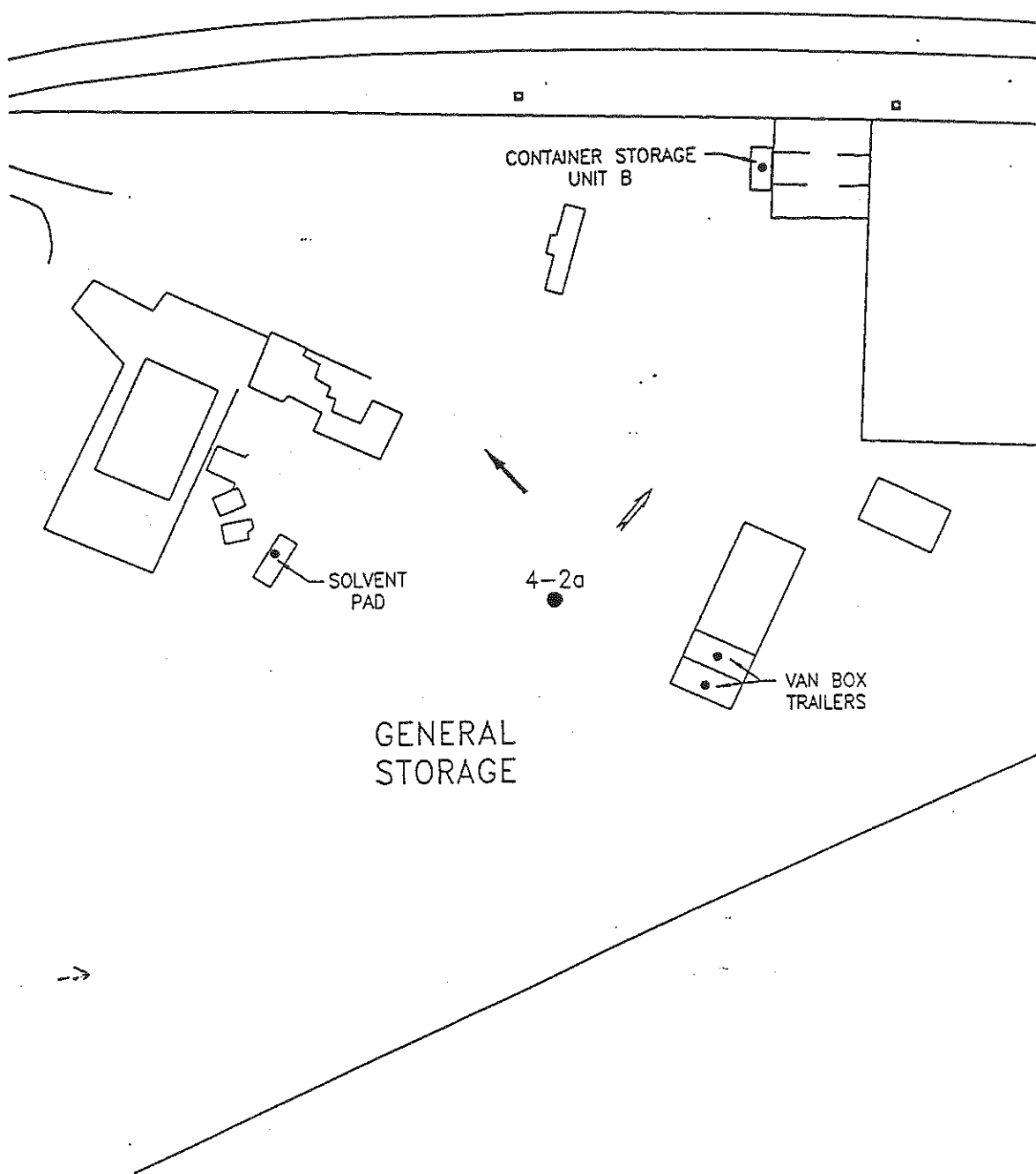
GENERAL EVACUATION PLAN FOR  
HWMU 3-1

AUGUST 1995

FIGURE 10

SOURCE:  
Base Map Provided By OLIN

**LEGEND**  
→ PRIMARY EVACUATION ROUTE  
⇨ ALTERNATE EVACUATION ROUTE



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:

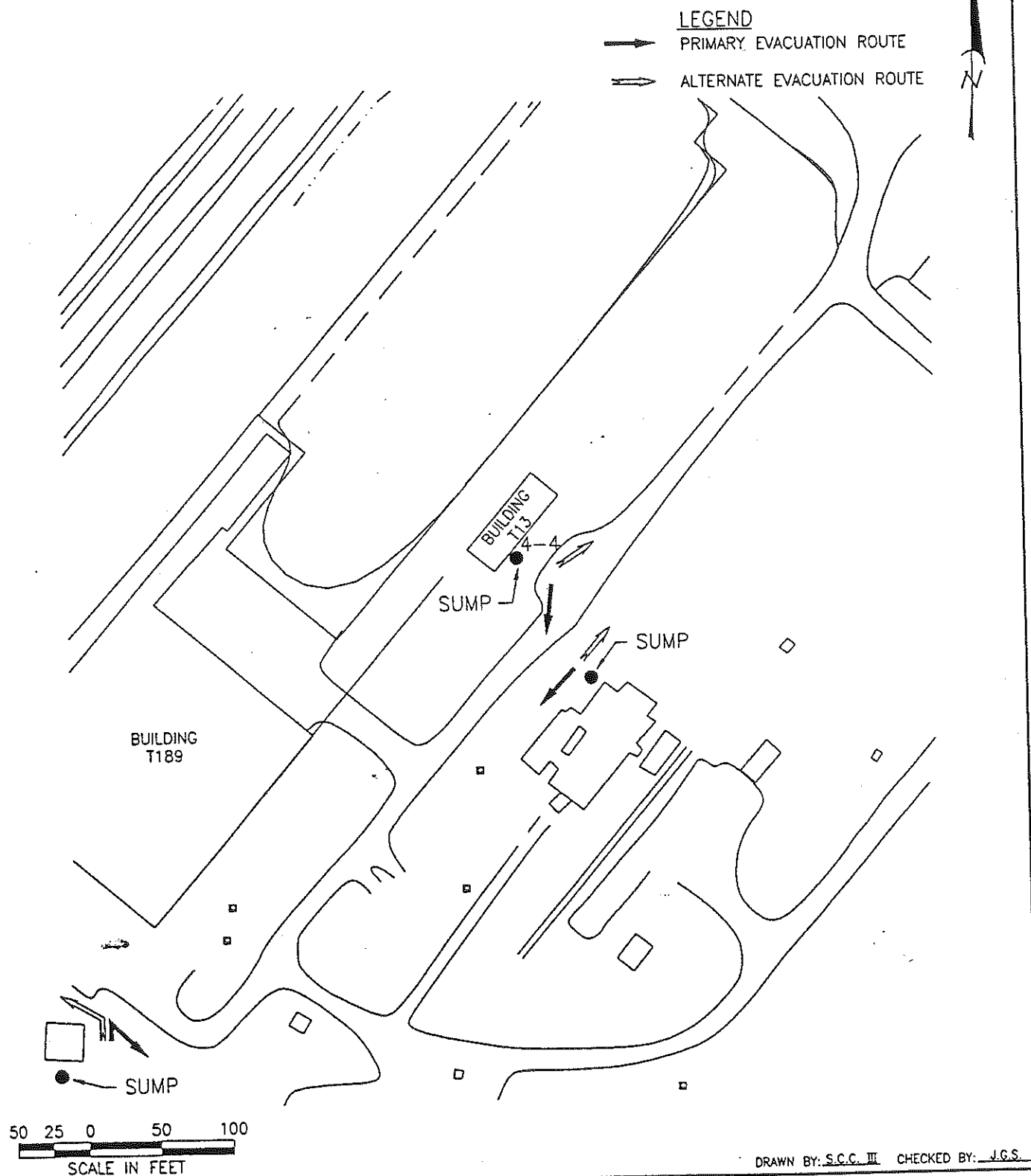


GENERAL EVACUATION PLAN FOR  
HWMU 4-2a

AUGUST 1995

FIGURE 11

SOURCE:  
Base Map Provided By OLIN



Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



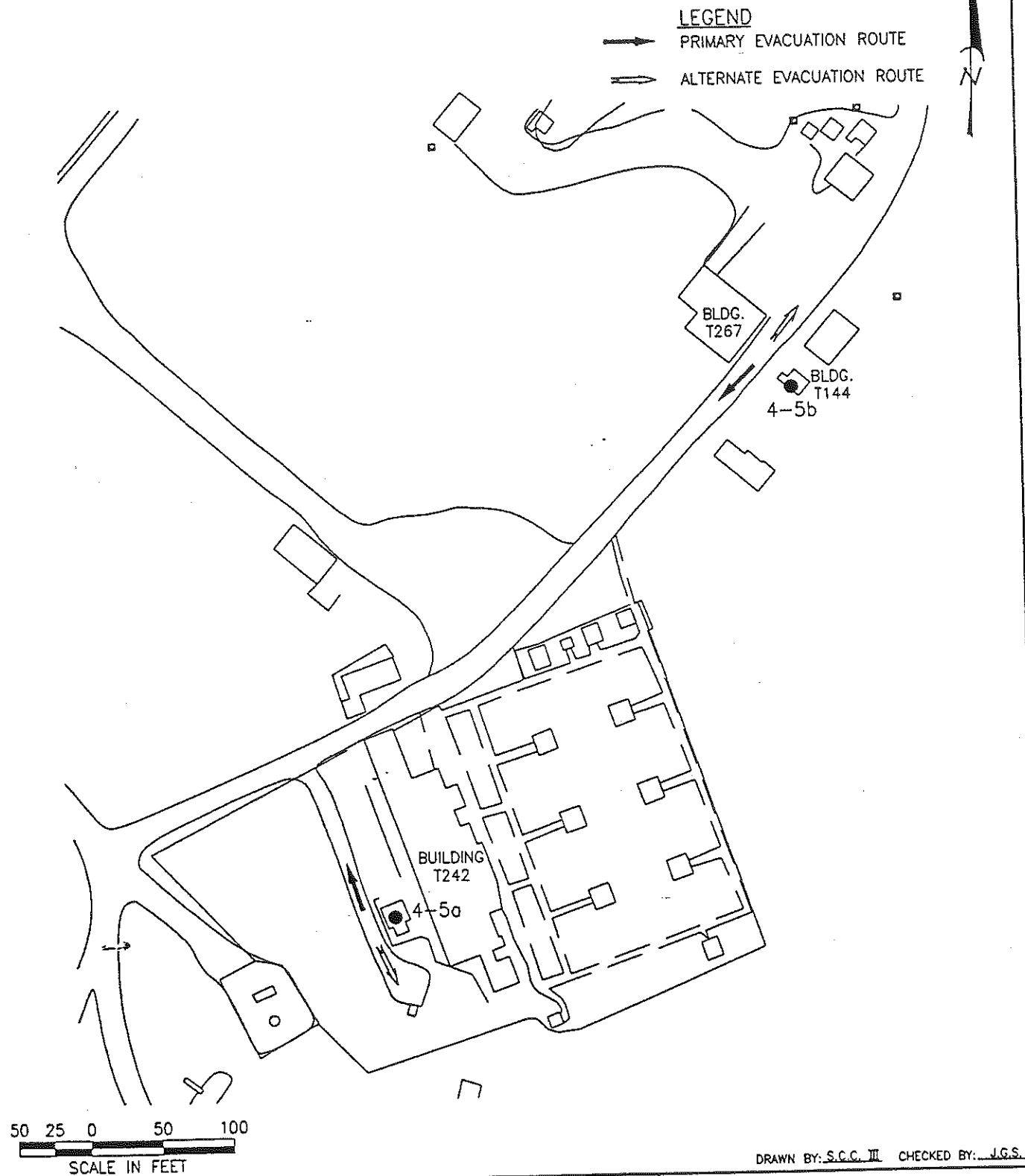
GENERAL EVACUATION PLAN FOR  
HWMU 4-4

AUGUST 1995

FIGURE 12



SOURCE:  
Base Map Provided By OLIN



Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:

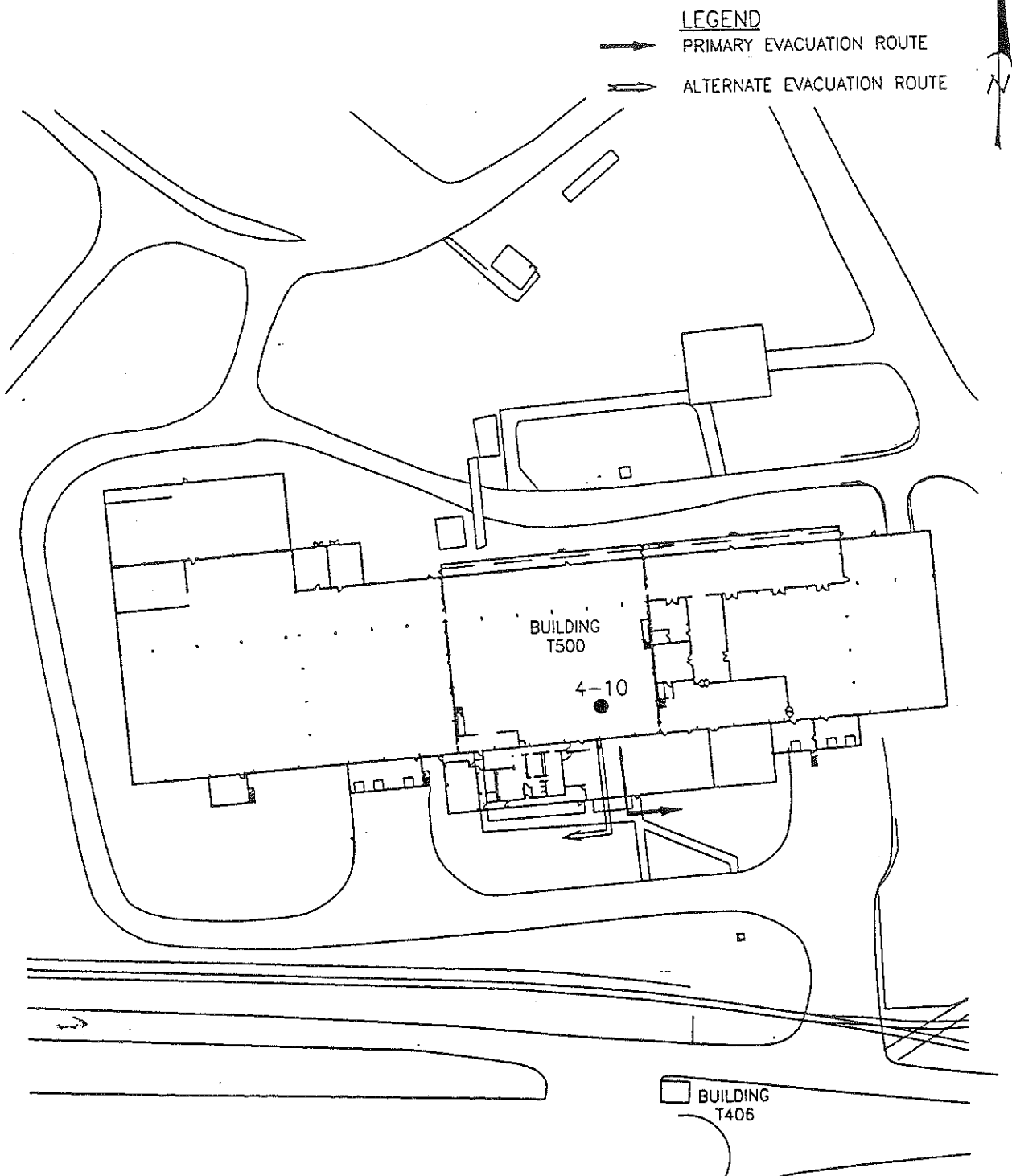


GENERAL EVACUATION PLAN FOR  
HWMUs 4-5a, 4-5b

AUGUST 1995

FIGURE 13

SOURCE:  
Base Map Provided By OLIN



50 25 0 50 100  
SCALE IN FEET

DRAWN BY: S.C.C. III CHECKED BY: J.G.S.

Prepared For:

OLIN  
EAST ALTON, ILLINOIS  
RCRA CONTINGENCY PLAN

Prepared By:



GENERAL EVACUATION PLAN FOR  
HWMU 4-10

AUGUST 1995

FIGURE 14

## APPENDIX A



## Appendix A

### MADISON COUNTY MUTUAL AID AGREEMENT

These Articles of Agreement, made and entered into on the 15th day of August, A.D. 19 89, by and between all the participating municipalities that have approved and adopted in the manner as provided by law and are herein listed at the end of this agreement.

.....

#### SECTION ONE - PURPOSE

The purpose of this Agreement is to provide for a program of Mutual Aid between all of the Participating Municipalities whereby the Aiding Municipalities will respond to the Stricken Municipality with such equipment and manpower as has been predetermined by the Fire Chiefs of each Municipality.

#### SECTION TWO - DEFINITIONS

For the purpose of this Agreement, the following terms are defined as follows:

- A. "Municipality": A City, Village or Fire Protection District having a recognized Fire Department;
- B. "Mutual Aid": A definite and prearranged written agreement and plan whereby regular response and assistance is provided for in event of a request by a senior officer in a Stricken Municipality by the Aiding Municipalities in accordance with the mutual aid pact.
- C. "Participating Municipalities": A Municipality that commits itself to this Mutual Aid Agreement by adopting an Ordinance or Resolution authorizing participation in the program with other participating Municipalities for rendering and receiving Mutual Aid in the event of a fire or other disaster in accordance with the Mutual Aid Agreement.
- D. "Stricken Municipality": The Municipality in which a fire or other disaster occurs that is of such a magnitude that it cannot be adequately handled by the local Fire Department.
- E. "Aiding Municipality": A Municipality furnishing fire equipment and manpower to a Stricken Municipality.

SECTION THREE - AGREEMENT TO EFFECTUATE THE MUTUAL AID PLAN

The Village President, Mayor or Board of Trustees of each participating Municipality is authorized on behalf of that Municipality to enter into and from time to time to alter and amend on the advice of the Fire Chief and with the consent of the governing body of that Municipality, an agreement with other Municipalities for Mutual Aid according to the following:

1. Whenever a fire or disaster is of such magnitude and consequence that it is deemed advisable by the Senior Officer present, of the Stricken Municipality, to request assistance of the Aiding Municipalities, he is hereby authorized to do so, under the terms of this Mutual Aid Agreement and the Senior Officer present of the Aiding Municipalities are authorized to and shall forthwith take the following actions:
  - a. Immediately determine what equipment is required according to the Mutual Aid Pact.
  - b. Immediately determine if the required equipment and personnel can be committed in response to the request from the Stricken Municipality.
  - c. Dispatch immediately the equipment required to the Stricken Municipality in accordance with the Agreement.
2. All of the participating Municipalities agree to waive all claims against the other party or parties for compensation for any loss, damage, personal injury or death occurring in consequence of the performance of this Mutual Aid Agreement. General Liability Insurance, Personal Injury and Property Damage Insurance against loss or damage of equipment is the responsibility of each participating Municipality as it applies to their own manpower and equipment. All services performed under this Mutual Aid Agreement shall be rendered without reimbursement to any Municipalities.
3. The Senior Officer present, of the Stricken Municipality, shall assume full responsibility and command for operations at the scene. He will assign Senior Officers and equipment, of the Aiding Municipalities, to positions when and where he deems necessary.
4. The Fire Chief, Officers and personnel of all participating Municipalities are invited and encouraged to frequently visit each others facilities for familiarization tours, and to jointly conduct training sessions and hypothetical disaster exercises.

SECTION FOUR - ADOPTION

This Mutual Aid Agreement shall be in full force and in effect with the passage and approval of a companion

A RESOLUTION AUTHORIZING THE EXECUTION OF  
AN AGREEMENT FOR MUTUAL AID

WHEREAS, it is in the best interest of the Village of East Alton to cooperate with other municipalities in the prevention and control of fire; and

WHEREAS, the approval of said mutual aid agreement is in the best interest of the Village of East Alton;

NOW, THEREFORE, BE IT RESOLVED BY THE Board of Trustees of the Village of East Alton THAT

SECTION ONE: A mutual aid agreement for fire protection is hereby approved; said agreement is attached hereto and made part of this Resolution.

SECTION TWO: That the Village President is hereby authorized to attest the mutual agreement made a part hereof and attached hereto.

SECTION THREE: This Resolution shall be in full force and effect from and after its passage and approval in the manner provided by law.

Adopted by the Village Board of Trustees

this 15th day of \_\_\_\_\_

August

19 89

Wm. H. Smith  
Village President

ATTEST

James H. Lee  
Village clerk



Illinois Environmental Protection Agency  
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D006271696 IEPA #: 1190200002  
 Facility Name: OLIN Corp- Main Plant Facility Phone #: 618-258-3033  
 Street Address: Shamrock St. County: Madison  
 City: East Alton State: IL Zip: 62024  
 Region: 6 Inspection Date: 3/9/93 From: 8:30a To: 1:00p  
 Weather: 40°, cloudy, dry 3 10 93 8:00a 12:00p

TYPE OF FACILITY

Notified As: G/T/TS Regulated As: G/T/TS  
 LDF? YES HPV? NO 90-Day F/U Required?: YES NO X

TYPE OF INSPECTION

CEI:        Sampling:        Citizen Complaint:        Closed:        Other:         
 CME/O&M: O&M Record Review:        Follow-Up to Inspection of:        Withdrawal:       

NON-REGULATED STATUS

SQG:        Claimed Nonhandler:        Other (Specify in Narrative):       

PART A

Notification Date: 8/18/80, from (initial) or (subsequent) Notification.  
 Initial Part A Date: 11/18/80 Amended: 7/29/87  
 Part A Withdrawal requested:    /   /    Approved by (US)(IL) EPA:    /   /   

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 4/10/89 Final Permit Issued:    /   /   

ENFORCEMENT

Has the firm been referred to -- USEPA Y or N 8/12/87  
 Illinois Attorney General: Y or N    /   /    County State's Attorney: Y or N    /   /   

ORDERS ISSUED

CACO: 3/30/88 CAFO:    /   /    Consent Decree:    /   /     
 Federal Court Order:    /   /    State Court Order:    /   /    IPCB Order:    /   /   

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report		
							19 90	19 91	19 92
504	YES	N/A*	YES	Pursuing extended closure	NO	NO	YES	YES	YES
Facility has other activities, but this was by one inspected during the O&M									

RECEIVED

22 MAR 1993

IEPA/DLPC

**OWNER****OPERATOR**

Name <u>OLIN Corp</u>	Name <u>OLIN Corp</u>
Address <u>Shamrock St.</u>	Address <u>Shamrock St.</u>
City <u>East Alton</u>	City <u>East Alton</u>
State <u>IL</u> Zip <u>62024</u>	State <u>IL</u> Zip <u>62024</u>
Phone # <u>618-258-3033</u>	Phone # <u>618-258-3083</u>

**PERSON(S) INTERVIEWED****TITLE****PHONE #**

<u>Louis Patten</u>	<u>Environmental Engineer</u>	<u>618-258-5728</u>
<u>Robert Sada</u>	<u>Environmental Scientist</u>	<u>314-428-8880</u>
<u>Richard Scott</u>	<u>Senior Hydrogeologist</u>	<u>314-428-8880</u>

**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

<u>Gina Search</u>	<u>IEPA/EP5 I</u>	<u>618-346-5120</u>
<u>Karen Nelson</u>	<u>IEPA/EP5 III</u>	<u>217-786-6892</u>

**PREPARED BY****AGENCY/TITLE****PHONE #**

<u>Gina Search</u>	<u>IEPA/EP5 I</u>	<u>618-346-5120</u>
--------------------	-------------------	---------------------

**SUMMARY OF APPARENT VIOLATIONS**

Area	Class	Section
DGW	1	725.192(a)(1)
DGW	1	725.192(a)(2)

Area	Class	Section

Area	Class	Section



DATE: March 18, 1993

TO: DLPC Division File

FROM: Gina R. Search, DLPC/FOS - Collinsville

Subject: LPC No. 1190200002 - Madison County  
Olin Corporation  
ILD No. 006271696  
Subpart F

A Subpart F Operation and Maintenance Inspection was conducted by Gina Search and Karen Nelson, both BOL/FOS on March 9 & 10, 1993 for Olin's groundwater monitoring system that is installed around the Zone 6 wastewater treatment facility (WWTF) emergency holding lagoon. Mr. Louis Patton of Olin, and Mr. Rich Scott and Mr. Robert Sada, both of Fugro McClelland were interviewed during the inspection.

#### General Background

Olin Corporation, located in East Alton, Illinois, has two manufacturing facilities referred to as the Winchester Group and the Brass Group. Small arms ammunition, primer explosives, and other ammunition related products are manufactured by the Winchester Group. The Brass Group manufactures copper base alloy products. Regulated hazardous waste activities at this facility include storage in a surface impoundment (S04).

Originally there was just one Wastewater Treatment Facility (Zone 6 WWTF) at Olin, and wastewater from nickel plating, chrome plating and bullet copper plating operations was discharged into the process sewers leading to the Zone 6 WWTF. If necessary this water was diverted to the Emergency Holding Lagoon. The sludge generated from these activities was considered hazardous.

After 1988 there were no hazardous flows from the Zone 6 WWTF diverted to the lagoon. In 1991 the Winchester WWTF was built, and this plant received all of the hazardous wastewater. At that time the Zone 6 WWTF began receiving only nonhazardous wastewater.

Olin has recently used the Emergency Holding Lagoon in January 1993. A heavy storm filled the overflow basin and combined nonhazardous process water and storm waters were allowed to flow into the unit. Olin foresees the need to use the Emergency Holding Lagoon more frequently due to their pumping level capacities.

In August 1984 a hydrogeologic investigation was conducted, and six monitor wells (OMW101-OMW106) were installed. Two organics were detected during sampling, and eight additional monitoring wells were installed to determine the rate and extent of migration of hazardous constituents. It was determined that hazardous waste

constituents had entered the groundwater and quarterly monitoring became required until final closure of the facility.

Olin is currently implementing a Part 725 Groundwater Quality Assessment Program. Chloroform and 1,1,1 Trichloroethane (TCA) had been detected in the groundwater in the vicinity of the emergency holding lagoon, but apparently these contaminants have not been above detection limits in groundwater samples since June 1989.

The apparent violations cited during the 1990 Subpart F inspection were resolved, and Olin had no outstanding Subpart F violations prior to this inspection.

Olin is seeking Agency approval concerning a delayed closure plan for this RCRA hazardous waste unit (Zone 6 lagoon). A RCRA Part B Permit has been issued to Olin for other hazardous waste units at the facility, and the delayed closure plan is being addressed as a RCRA Part B permit modification. Until the time that the Part B Permit is modified to include the Zone 6 Lagoon, this unit remains under interim status.

#### Part One - Sampling and Analysis Plan, 725.192

Olin's Sampling and Analysis Plan (SAP) currently appears to include the following documents:

- Groundwater SAP dated August, 1984 and revised January, 1985, February, 1987, August 1987 and September 1990.
- Contingent Corrective Measures Plan for Zone 6 WWTF Emergency Holding Lagoon, dated February 1990.
- February 28, 1990, letter from DLPC/Compliance to Olin.

Olin's SAP does not include guidance for well depths to be taken during every sampling activity. It is recommended that this should be included in the plan so that the possible silting and settling of wells can be determined. These conditions could lead to false groundwater quality data.

#### Part Two - Operating Records

During the record review it was noted that Olin's annual report did not include any groundwater monitoring information. Hope Wright was contacted by the inspector and she explained that it is not necessary for this information to be included in the annual report if they are submitting their quarterly sampling reports to the agency.

While the sampling crew was collecting samples, they were also conducting inspections on each of the monitoring wells. The outline presented to Olin during the previous inspection was being followed. The results were documented in the operating record. Also records of repairs made to the monitoring wells were being

kept in the operating record.

#### Field Inspection of Monitor Wells

Each of Olin's monitor wells was inspected, a photo of each well was taken and the IEPA monitor well checklist was completed for each well.

All of the wells appeared to be in good condition. The surface seals were being properly maintained as well as the riser pipes and the interior and exterior casing. Each well was securely locked. Well # OMW 103 had some standing water, but this was pumped out prior to sampling.

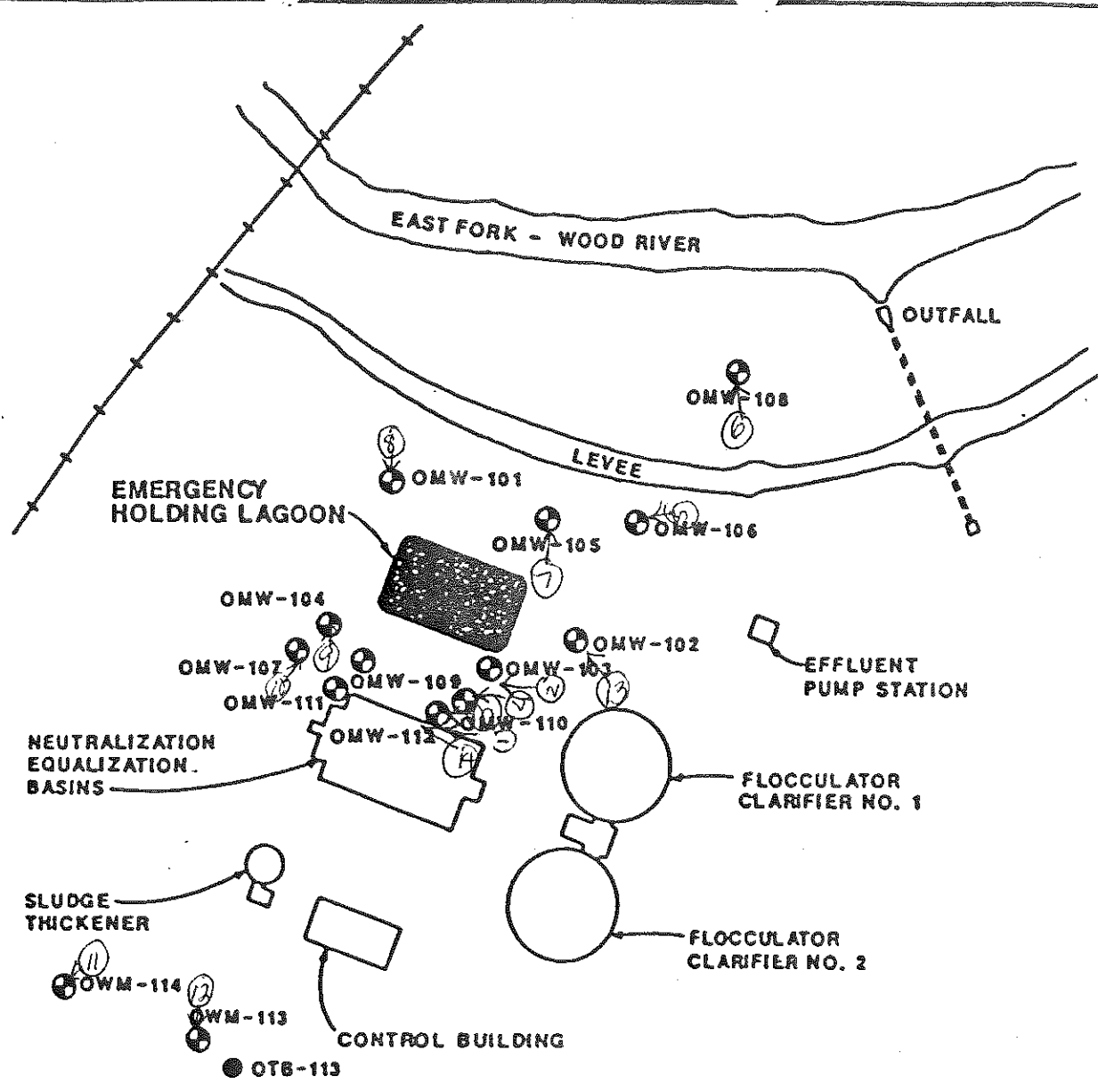
#### Field Sampling Techniques

The following discrepancies pertaining to Olin's Sampling and Analysis Plan (SAP) were noted during the sampling activities.




The SAP was not being followed during sample collection procedures. The SAP states that a teflon bailer will be used to purge and sample the wells. During the observed sampling activities, a polyethylene bailer was used to purge and sample the wells. 725.192(a)(1) will be cited for this apparent violation.

The SAP states that sample filtering is conducted by the independently contracted laboratory in Olin's Zone 6 Wastewater Treatment Facility's Control Building. During the observed sampling activities, the sample filtering was conducted by the contracted sampling crew. The samples were field filtered using disposable Geotech filters. 725.192(a)(2) will be cited for this apparent violation because the facility failed to follow the guidance outlined in the (SAP).

Issues of concern noted by the inspector include the taking of monitor well depths during each round of sampling. The contracted sampling crew explained that they rely on well depths taken during two initial rounds of sampling. This procedure does not take into consideration the possibility of monitoring wells becoming silted in. Secondly, some monitor wells were constructed to be flush with the ground surface. These wells have locking caps without air vents. This can cause a vacuum to form in the well casing. If static water depths are taken immediately after these caps are removed, it may be possible that the vacuum pressure could lead to false static water level readings. Thirdly, the contracted sampling crew did not have a copy of Olin's SAP available during the sampling activities. They were following their own general sampling procedures, not those outlined by the Olin SAP.



### EXPLANATION

-  RAILROAD  
 MONITORING WELL LOCATION  
 OMW-101 AND NUMBER  
 BOREHOLE LOCATION AND NUMBER  
 QTB-113



**John Mathes & Associates, Inc.**

APPROXIMATE MONITORING  
WELL LOCATIONS ZONE 6  
EMERGENCY HOLDING LAGOON

OLIN ZONE 6  
EAST ALTON, ILLINOIS  
12883254

FIGURE 1

Roll # 2049

DATE: March 9, 1993

TIME: 8:30 - 1:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

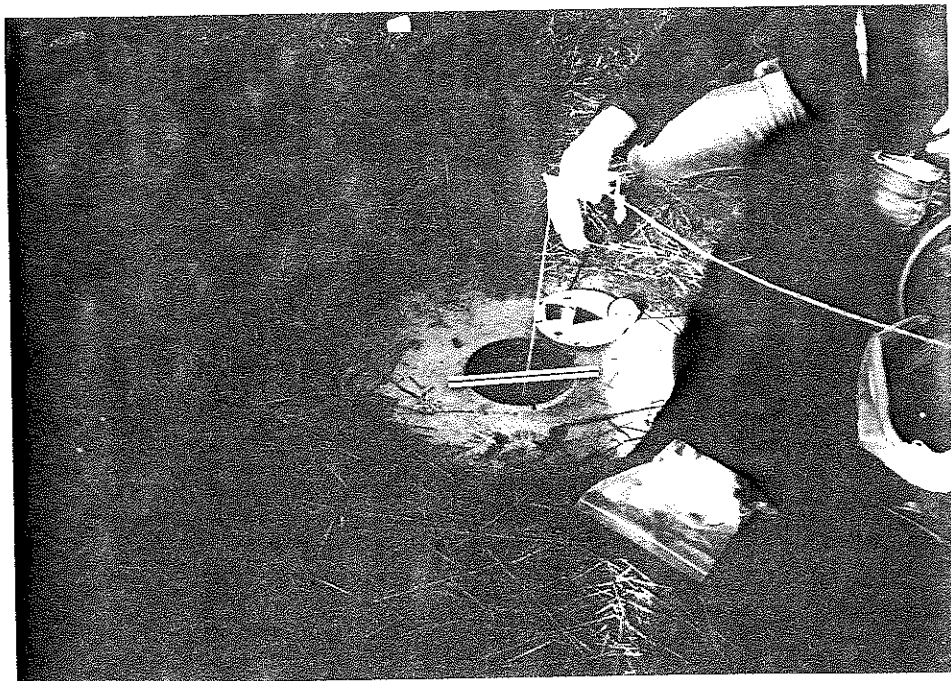
PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 2049 PHOTO# 1

PHOTOGRAPH BY:

Mina Search



DATE: March 9, 1993

TIME: 8:30 - 1:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

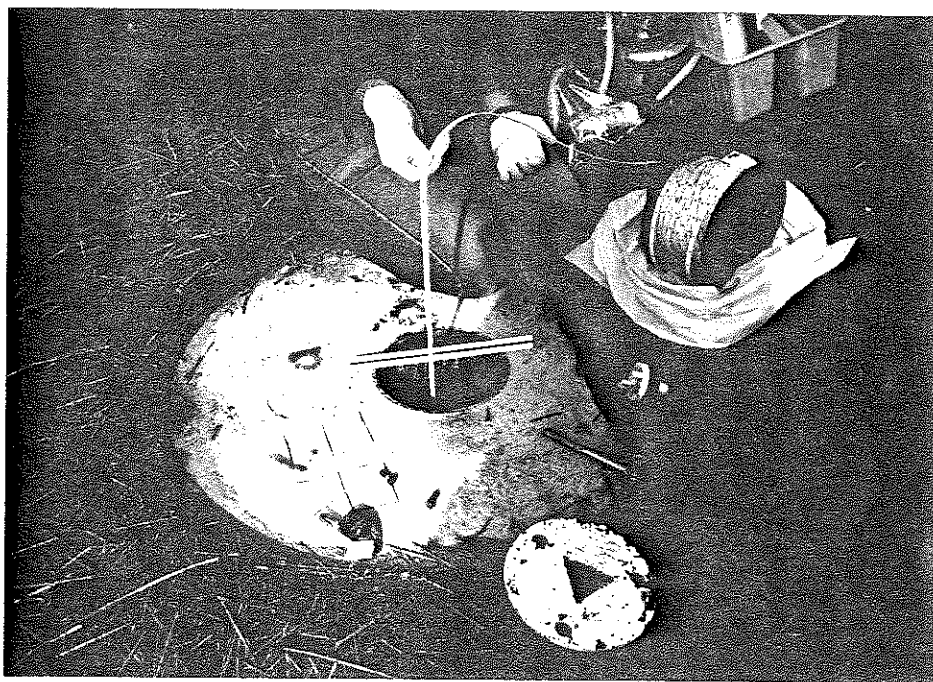
PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 2049 PHOTO# 2

PHOTOGRAPH BY:

Mina Search



DATE: March 9, 1993

TIME: 8:30 - 1:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

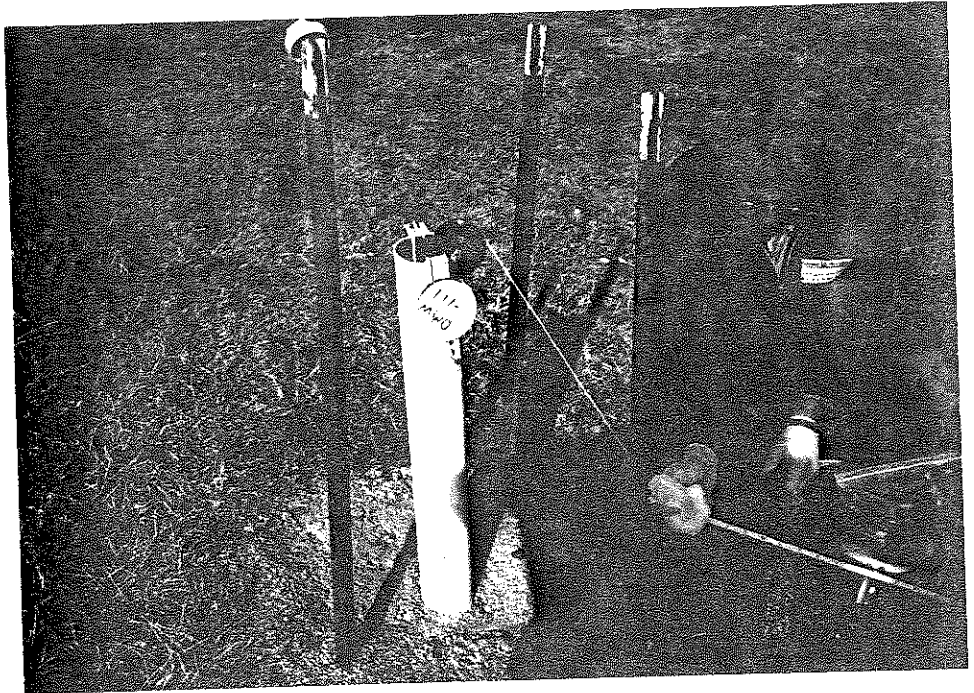
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West

ROLL# 2049 PHOTO# 3

PHOTOGRAPH BY:

*Gina March*



DATE: March 9, 1993

TIME: 8:30 - 1:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

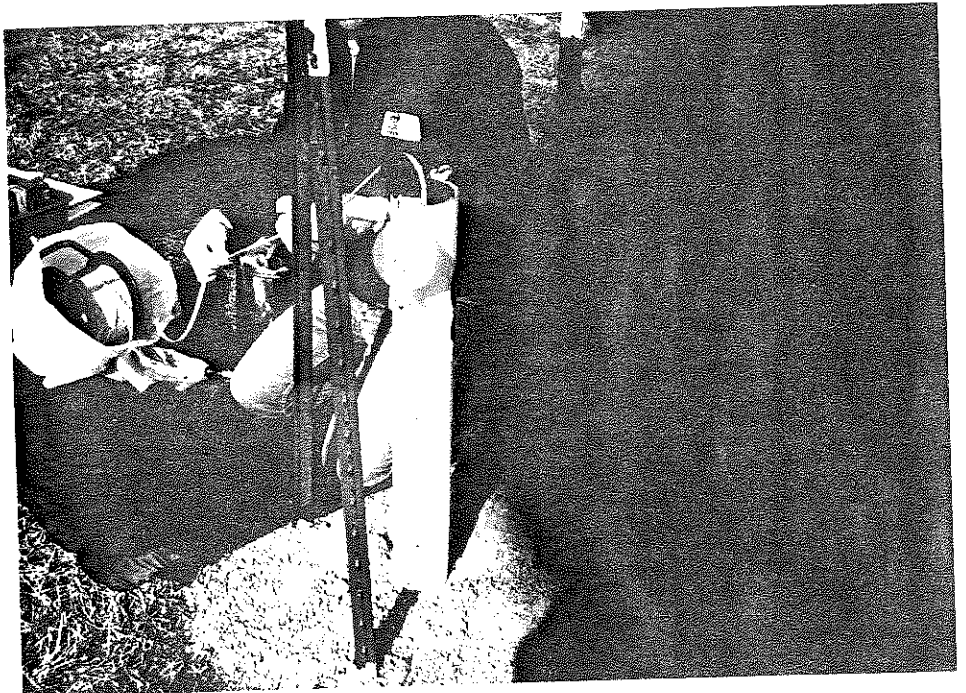
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West

ROLL# 2049 PHOTO# 4

PHOTOGRAPH BY:

*Gina March*





DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

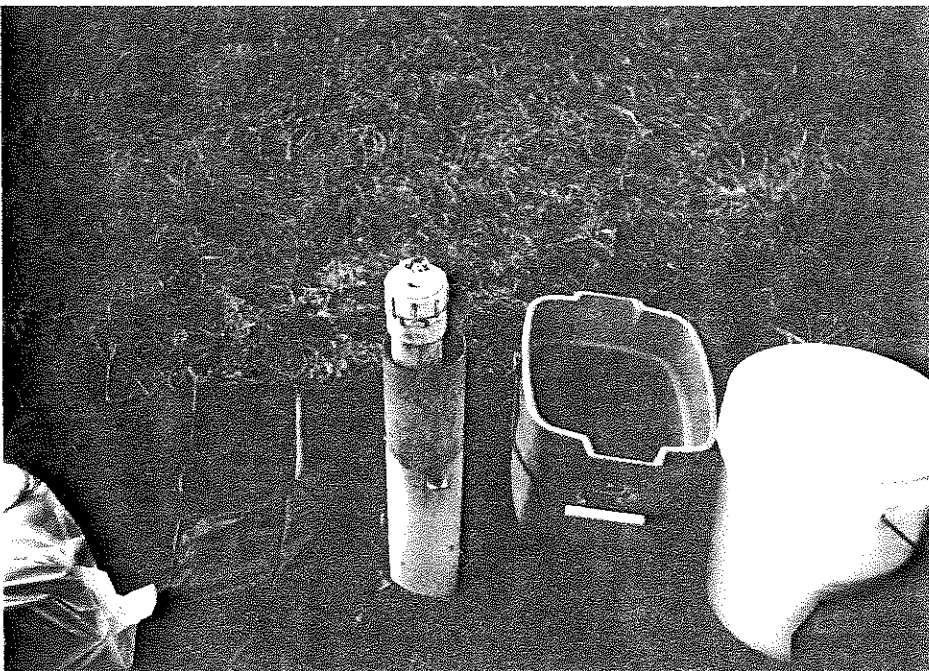
PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 2049 PHOTO# 5

PHOTOGRAPH BY:

Gina March



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

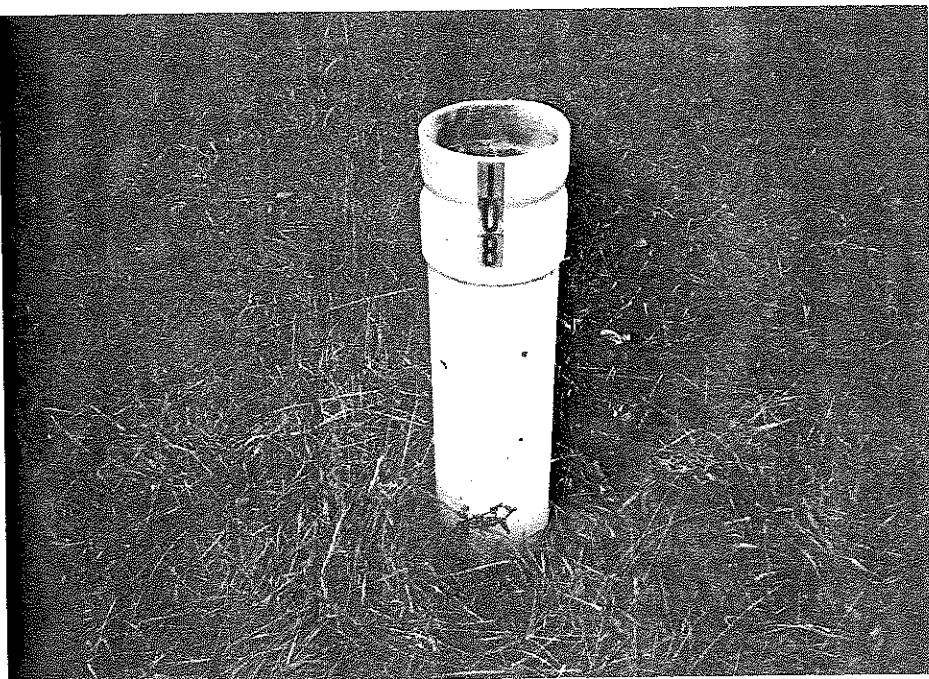
PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 2049 PHOTO# 6

PHOTOGRAPH BY:

Gina March



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

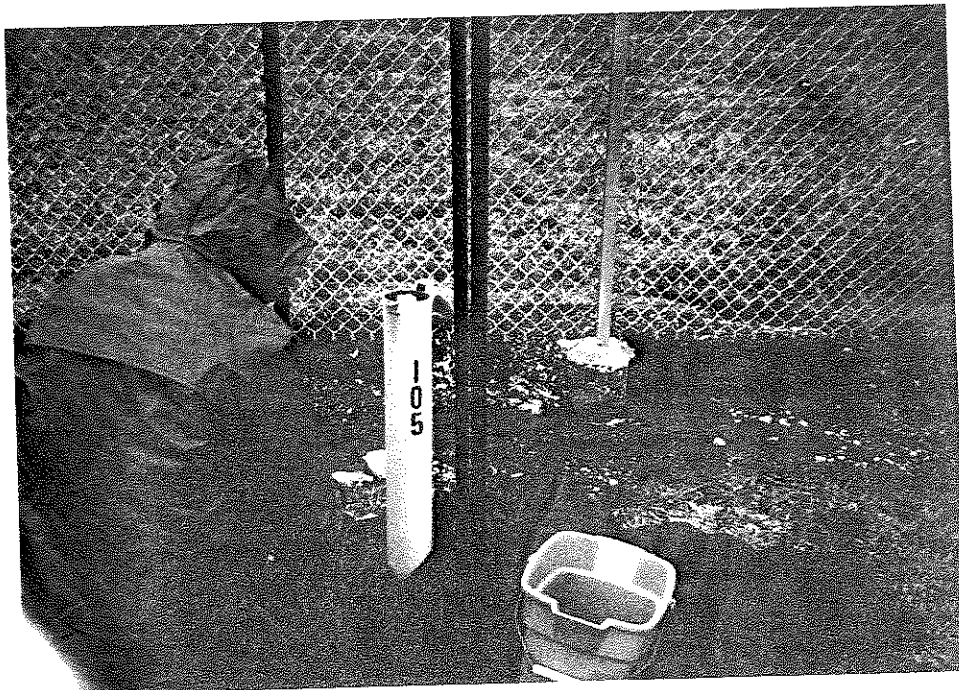
PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 2049 PHOTO# 7

PHOTOGRAPH BY:

Gina Search



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

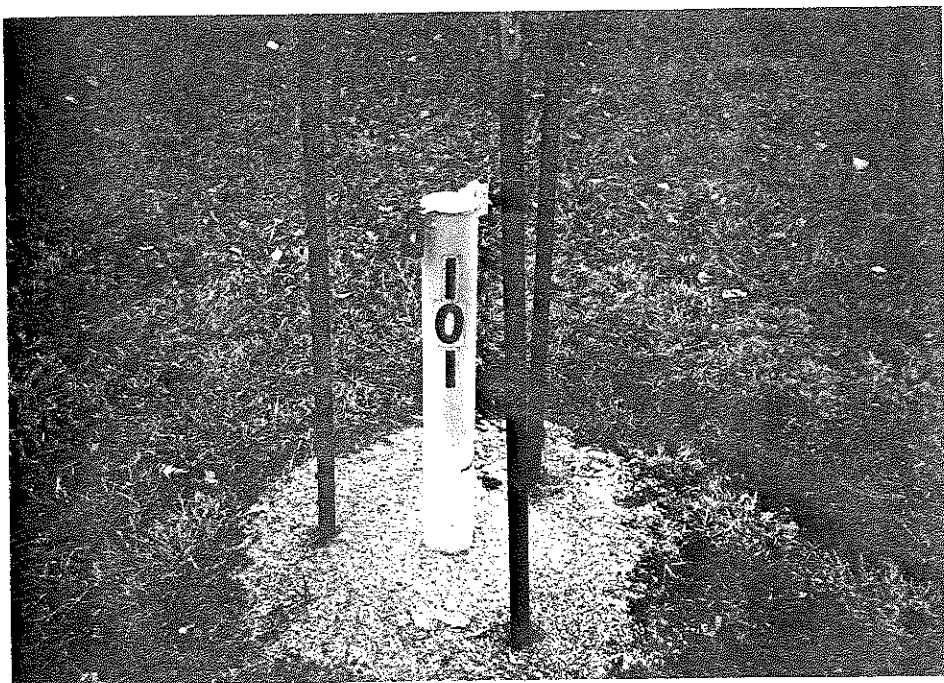
PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 2049 PHOTO# 8

PHOTOGRAPH BY:

Gina Search





DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

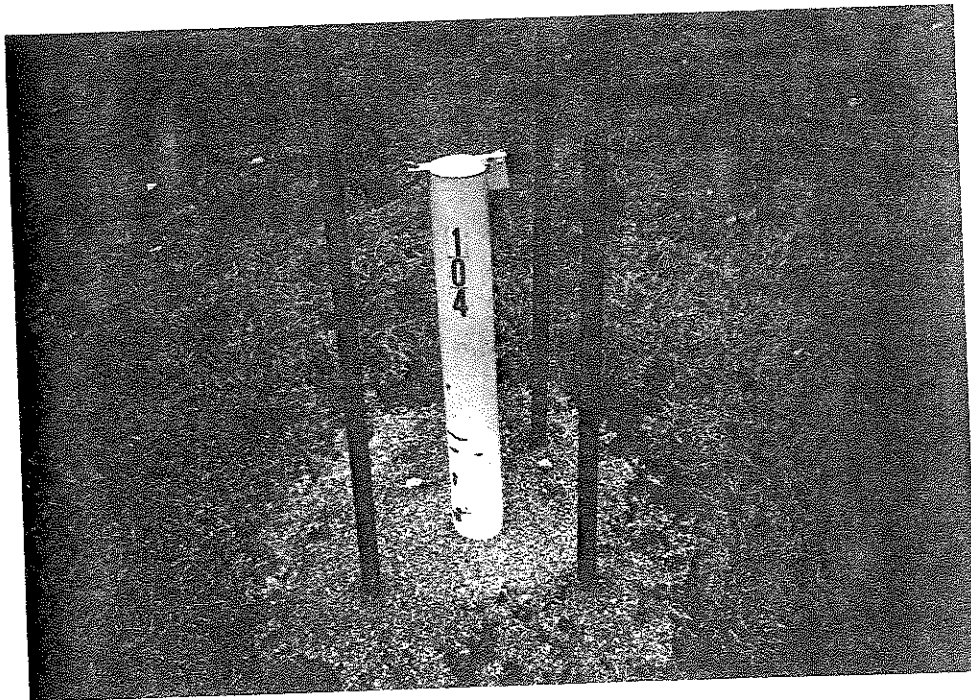
PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 2049 PHOTO# 9

PHOTOGRAPH BY:

*Gina Search*



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

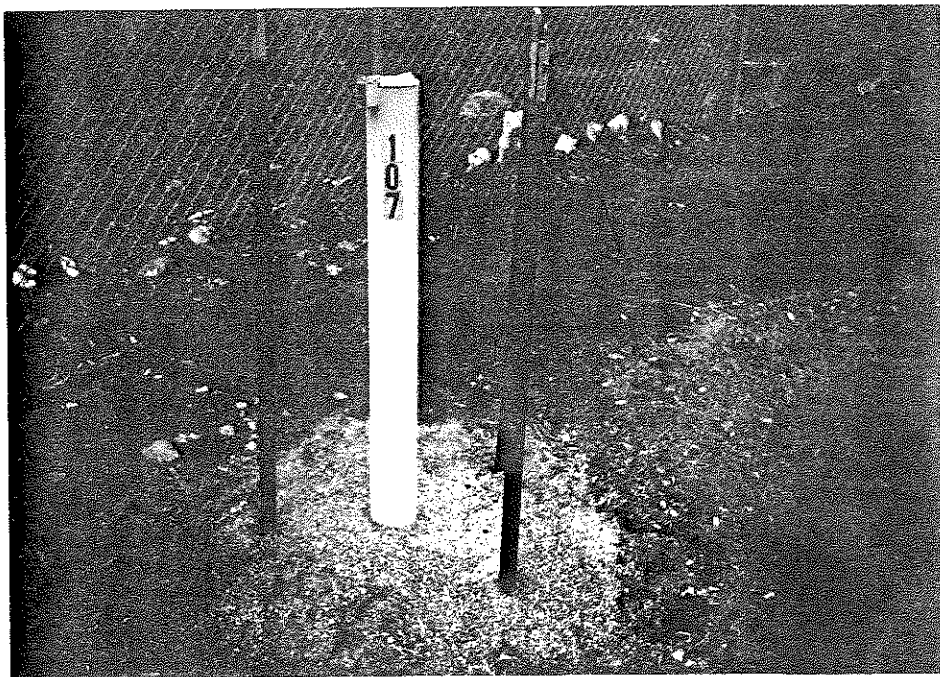
PHOTOGRAPH TAKEN TOWARD THE:

Northeast

ROLL# 2049 PHOTO# 10

PHOTOGRAPH BY:

*Gina Search*



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

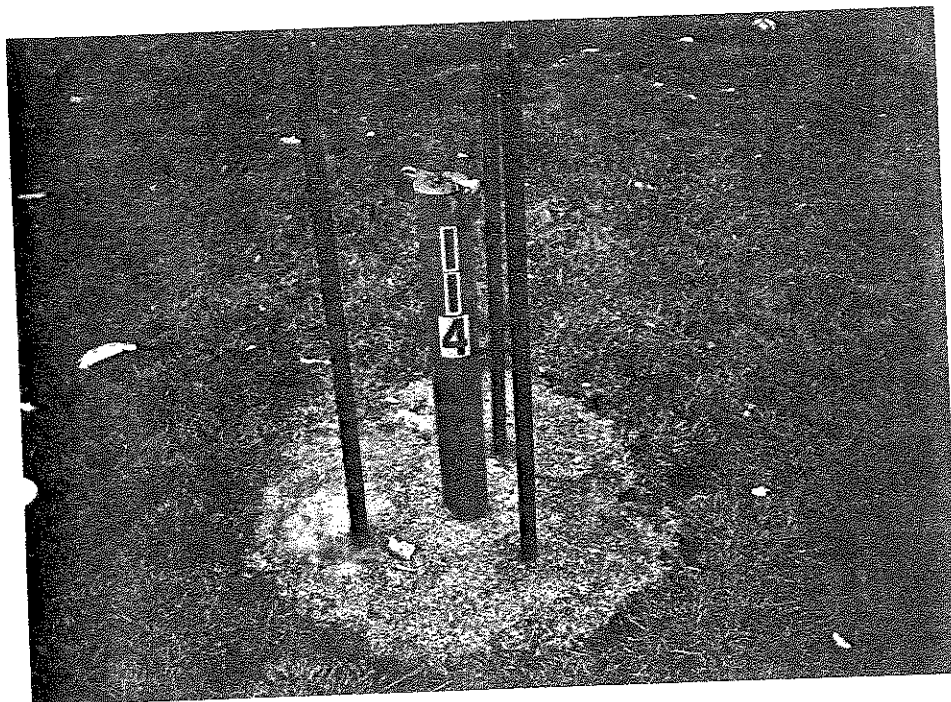
PHOTOGRAPH TAKEN TOWARD THE:

Southwest

ROLL# 2049 PHOTO# 11

PHOTOGRAPH BY:

Gina March



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

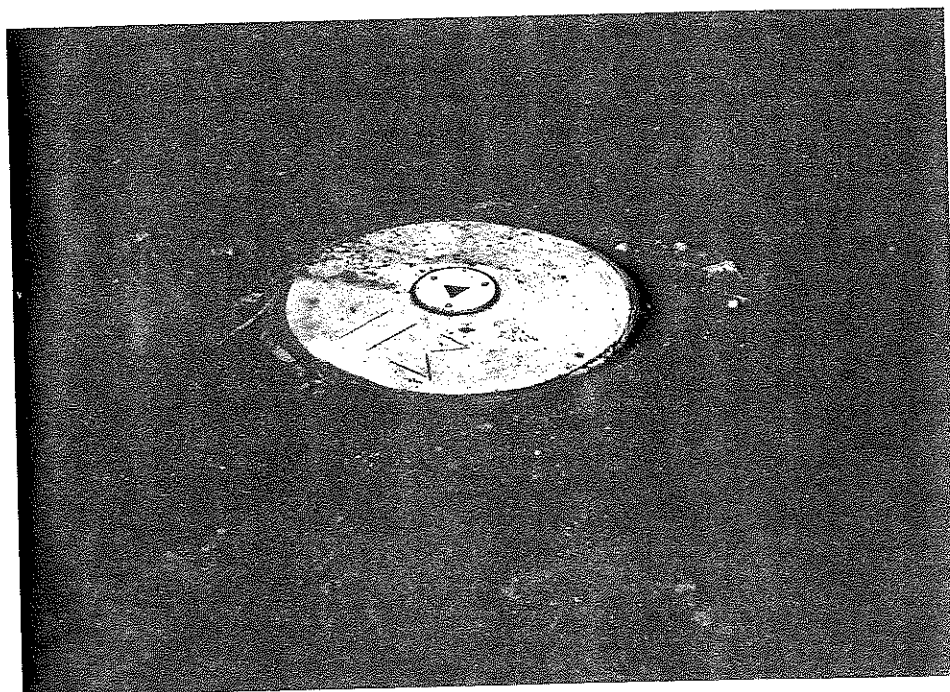
PHOTOGRAPH TAKEN TOWARD THE:

South

OLL# 2049 PHOTO# 12

HOTOGRAPH BY:

Gina March



DATE: March 10, 1993

TIME: 8:00 - 12:00

I.D. 1190200002

Madison County

OLIN Corp. - Main Plant

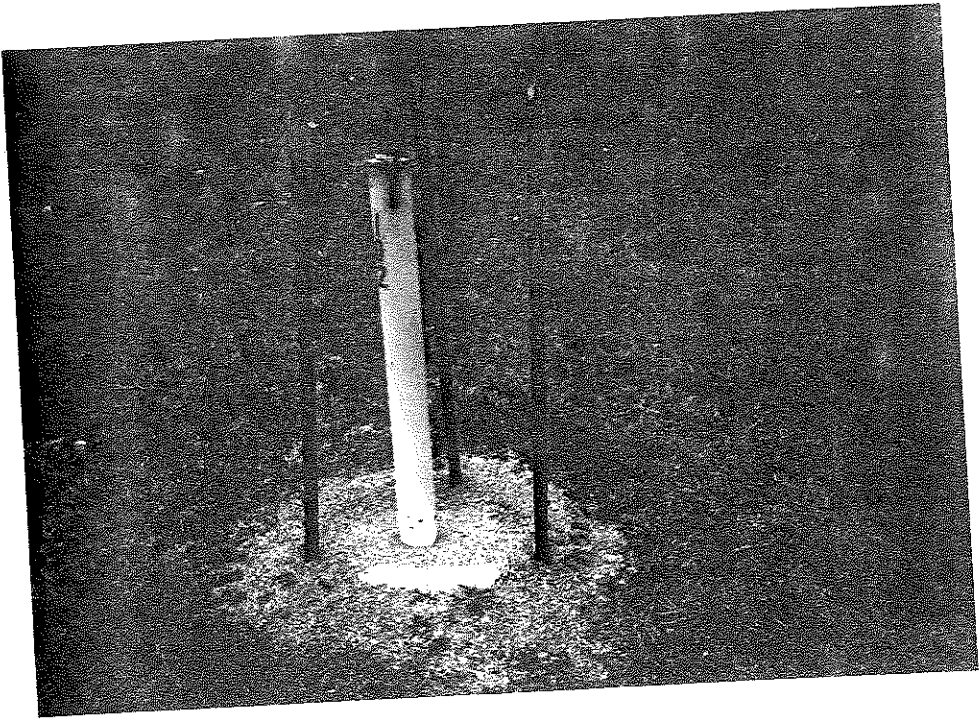
PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 2049 PHOTO# 13

PHOTOGRAPH BY:

*Gina Darch*



DATE: \_\_\_\_\_

TIME: \_\_\_\_\_

I.D. \_\_\_\_\_

\_\_\_\_\_ County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# \_\_\_\_\_ PHOTO# \_\_\_\_\_

PHOTOGRAPH BY:

\_\_\_\_\_

# APPENDIX A-1

## FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

### General Information

USEPA Number: ILD006271696 IEPA Number: 1190200002  
 Major Facility: (YES) NO Notified As: G/T/TSD Regulated As: G/T/TSD  
 Facility Name: Olin Corp - Main Plant  
 Street: 427 N. Shamrock St.  
 City: East Alton State: Illinois Zip Code: 62024  
 Phone: 618-258-5038 County: Madison  
 Facility Contact Official: Lou Patton Branch/Organization: Environmental  
 Title: Sr. Engineering Technician  
 Region: 6 Date of Inspection:    /   /    Time: (From)     (To)      
 Type of Inspection: (GWM) RR F/U    /   /     
 (Date of Initial Inspection)

### Preparer Information:

N. Gina B. Search  
 Agency/Title: EPA/LSCT  
 Telephone: (618) 346-5120

Section	Class I	Class II
725.192 (a)(1)	1	
725.192 (a)(2)	1	
TOTAL Class I's & II's		2 0

### Type of facility: (check appropriately)

- a) surface impoundment
- b) landfill
- c) land treatment facility
- d) disposal waste pile\*

YES	NO	UNKNOWN	WAVIED
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Groundwater Monitoring Program

1. Was the groundwater monitoring program reviewed prior to site visit?  
if "NO",
  - a) Was the groundwater program reviewed at the facility prior to site inspection?
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)

YES	NO	UNKNOWN	WAVIED
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\*Listed separate from landfill for convenience of identification.

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Wavied</u>
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	<u>X</u>	---		---
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)	<u>X</u>	---		
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)	<u>X</u>	---		
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?	<u>X</u>	---		---
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	<u>X</u>	---	---	
a) If the facility contains multiple waste management components, is each component adequately monitored?	<u>N/A</u>	---		
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.	<u>X</u>	---	---	
7. Well completion details. 725.191(c)				
a) Are wells properly cased?	<u>X</u>	---	---	
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	<u>X</u>	---	---	
c) Are annular spaces properly sealed to prevent contamination of ground-water?	<u>X</u>	---	---	

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waved</u>
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)	<u>X</u>	---	---	
a) Has it been followed?	---	<u>X</u>	---	
b) Is the plan kept at the facility?	<u>X</u>	---	---	
c) Does the plan include procedures and techniques for:				Actual sampling practices defer from sampling and analysis plan - refer to inspection narrative
1) Sample collection?	<u>X</u>	---	---	
2) Sample preservation?	<u>X</u>	---	---	
3) Sample shipment?	<u>X</u>	---	---	
4) Analytical procedures?	<u>X</u>	---	---	
5) Chain of custody control?	<u>X</u>	---	---	
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)	<u>X</u>	---	---	
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)	<u>X</u>	---	---	
2) Parameters establishing ground-water quality? 725.192(b)(2)	<u>X</u>	---	---	
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)	<u>X</u>	---	---	
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)	<u>X</u>	---	---	
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)	<u>X</u>	---	---	

Yes      No      Unknown      Wavied

b) For facilities which have completed first year ground-water sampling and analysis requirements:

- 1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)
- 2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)

X      Facility is currently  
conducting assessment  
Monitoring Pursuant to  
725.193

c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)

X      ---

d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193

X      ---

10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)

X      ---

a) Does it describe a program capable of determining:

- 1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?
- 2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?
- 3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?

X      ---

X      ---

X      ---

b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)

X      ---

- 1) If a disposal facility, were(are) records kept through the post-closure period as well?

---      NA - Not Closed yet

	<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Wavied</u>
11. Have records been kept of analyses for parameters in 725.192(c) and (d)? 725.194(a)(1)	<u>X</u>	---		
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)	<u>X</u>	---		
13. Have records been kept of required elevations in 725.192(e)? 725.194(a)(1)	<u>X</u>	---		

\*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.



THE ONE

The field inspector and the enforcement official will meet and complete four tasks. Those tasks are: 1) review enforcement and permitting actions taken to date at the facility, 2) review the owner/operator's sampling and analysis program, 3) review the owner/operator's O&M program, and 4) prepare site-specific inspection objectives.

1. Facility identification number ILD006271696 1190200002
2. Name of facility contact Louis Pottan  
phone number (618) 258-5728
3. Address of facility OLIN Corporation  
427 N. Shamrock St.  
East Alton, IL 62024

4. Does the facility have:

Interim Status? (go to 5a)

detection monitoring  
assessment monitoring  
corrective action (§3008(h))

*Interim Status - Delayed closure  
under Adjusted Standard Pending.*

Permit Status? (go to 5b)

detection monitoring  
compliance monitoring  
corrective action

5a. Past actions taken at facility (interim status)

Type

Date(s)

Operation and Maintenance Inspection 6-14-90, 3-9-93-3/10/93  
Comprehensive (Ground-Water) 12-29-87  
Monitoring Evaluation 12-9-92-12-11-92, 3-9-93-3-10-93  
Case Development Inspection \_\_\_\_\_  
RCRA Facility Assessment \_\_\_\_\_  
Compliance Evaluation Inspection \_\_\_\_\_  
Ground-Water Task Force Investigation \_\_\_\_\_

Complete the following questions in regard to the actions listed on the previous page:

- Do you have a copy of completed inspection reports or site studies? Yes ☒ No ☐
- For each, summarize deficiencies identified in the owner/operator's sampling program and/or the owner/operator's operation and maintenance program.

725.192 a - SAP does not provide for measurement of total well depth during each round of sampling.

Go to 6a.

Identify enforcement actions issued to the facility in regard to interim stat  
ations.

<u>Action</u>	<u>Date(s)</u>
• §3008(a) complaint/order	_____
• §3013 complaint/order	_____
• §3008(h) complaint/order	_____
• §7003 complaint/order	_____
• Referral for litigation	_____
• Other	_____

Complete the following regarding the actions listed above:

- For each, identify if the enforcement action is focused on the owner operator's sampling and analysis program and/or the owner/operator's operation and maintenance program. Summarize relevant requirements imposed on the owner/operator.

## **Actions taken at the facility (permit status)**

Type

Date

- Permit Issuance
- Operation and Maintenance Inspection
- Comprehensive (Ground-Water)
- Monitoring Inspection
- Case Development Inspection
- Compliance Evaluation Inspection
- Other

_____
_____
_____
_____
_____
_____
_____

**Complete the following in regard to the actions listed above:**

- Do you have a copy of the permit and copies of inspection reports completed after permit issuance? Yes \_\_\_\_ No \_\_\_\_
- Summarize deficiencies identified after permit issuance regarding the owner/operator's operation and maintenance program.

**Go to 6b**

and analysis plan. (Note: Revise or add to the table if permit conditions dictate a different requirement the owner/operator must follow.) Does the Sampling and Analysis Plan: 725.192	Y/N
Include provisions for the measurement of static water elevations in each well prior to each sampling event?	2f Pg 9-10
Specify the device to be used for measuring water level elevations?	2f Pg 9-10
Specify the procedure for measuring water levels?	2f Pg 9-10
Provide for the measurement of depth to standing water and <sup>-10</sup> depth to the bottom of the well to 0.01 feet? <i>yes depth to water</i>	2f Pg 9-10
Explain whether dedicated or non-dedicated sampling equipment is used and the type of sampling equipment? <i>N/A - depth of well</i>	2f Pg 10
Describe procedures for evacuating wells?	2f Pg 10
Provide for the use of sampling devices constructed of inert materials such as fluorocarbon resin or stainless steel? <i>Teflon</i>	2f Pg 7-10
Provide for dedicated sampling devices for each well or alternately provide for decontamination of sampling devices and the collection of blanks between wells? <i>Bailer washed w/ non-phosphate detergent followed by deionized water</i>	2f Pg 11
Provide for the collection and containerization of samples in the order of volatilization potential?	2f Pg 10
Identify the preservation methods and sample containers the owner/operator will use?	2f Pg 12
Describe procedures for transferring samples to off-site laboratories?	2f Pg 13-16
Describe a chain-of-custody program which includes the use of sample labels, sample seals, field logbooks, chain-of-custody records, sample analysis request sheets, and laboratory logbooks?	2f Pg 13-16
Include provisions for collection of field, trip, and equipment blanks?	2f Pg 6
Include an inventory of sampling equipment and sampling devices used as part of the monitoring program?	2f Pg 7
Include detailed operating, calibration, and maintenance procedures for each sampling device?	2f Pg 6.

(Continued)

(Continued from previous page)	Y/N
Include maintenance schedules for sampling equipment? (Refer to Appendix D for discussion of maintenance techniques for gas bladder pumps.)	Y Pg 6-9
Include decision criteria to be used to replace or repair sampling equipment and/or monitoring wells?	Y Pg 6-9
*Describe in detail sample handling procedures in place at the owner/operator's laboratory (refer to RCRA Laboratory Audit Inspection Guide for more detail)?	Y Amended Part B being reviewed by permit Section adequacy
*Describe in detail the procedures that will be used to perform analyses in the owner/operator's laboratory (refer to RCRA Laboratory Audit Inspection Guide for more detail)?	"
*Describe in detail quality assurance/quality control procedures in place? (refer to RCRA Laboratory Audit Inspection Guide for more detail.)	"

\*NOTE: The *RCRA Laboratory Audit Inspection Guide (RCRA Ground-Water Monitoring Systems)* describes the information the owner/operator should include in the Sampling and Analysis Plan regarding the owner/operator's laboratory program. The inspector may want to supplement the checklist in this manual with the checklist in the *RCRA Laboratory Audit Inspection Guide* while planning an operation and maintenance inspection.

Go to 8

8. Complete the following table. Use a separate entry for each well and piezometer in the monitoring system:

Identification Number	Type of Well Sampling Equipment (pump or bailer)	Depth to Water Last Inspection (if available)	Depth to Bottom Last Inspection (if available)	Notes/Comment
1. OMW 103	bailer	30.72	31.77	
2. OMW 106	bailer	22.36	29.79	
3. OMW 110	bailer	30.90	28.72	
4. OMW 113	bailer	35.68	42.10	
5. OMW 114	bailer	34.84	42.48	
6.				
7.				
8.				
9.				
10.				
11.				

# COMMENTS ON SAMPLING AND ANALYSIS PLAN



The field inspector will complete four tasks during the field inspection. They are:

1) review the operating record to identify evidence of deficiencies in the owner/operator's sampling and/or operation and maintenance programs; 2) visually inspect each well and piezometer for evidence of damage or deterioration; 3) obtain measurements from the operations record of depths of water levels and well depths for each well and piezometer; and 4) visually observe the owner/operator's field crew as they collect ground-water samples.

Name of inspector(s) Dina Search / Karen Nelson

Date(s) of inspection 3/9/93

<b>1. Review the operating record of the facility.</b> <b>Does the operating record:</b>	<b>Y/N</b>
Include annual reports of ground-water monitoring results including ground-water level data from each well and piezometer in the monitoring system? <i>refer to narrative</i>	<i>N</i> <i>Quarterly reporting is not required</i>
Include an inventory of all sampling devices and purging equipment in use at the facility and information on model number, serial number and manufacturer's name?	<i>Y</i>
Include detailed operating, calibration and maintenance procedures for each sampling device?	<i>Y</i>
Describe decision criteria to be used to replace or repair sampling equipment and/or monitoring wells?	<i>Y</i>
Include schedules for performing operation and maintenance activities related to the ground-water monitoring system?	<i>Y</i>
Include records for ground-water monitoring which provide information on 1) the date, exact place and time of sampling or measurements; 2) the individual(s) who performed the sampling or measurements; 3) the date(s) analyses were performed; 4) the analytical techniques or methods used; and 5) the results of such analyses?	<i>Y</i>
Include records of all monitoring information including all calibration and maintenance records?	<i>Y</i>
Include records of monitoring information including determination of ground-water surface elevations?	<i>Y</i>
Include a determination of ground-water flow rate and direction(s) in the uppermost aquifer on an annual basis (e.g., prepare a potentiometric map annually using data collected during the year)?	<i>Y</i>
Provide for more frequent and intensive inspection of wells constructed of non-inert casing such as PVC? (Refer to Appendix A for permit example.)	<i>N/A</i>

# COMMENTS ON OPERATING RECORD

*[Faint, illegible handwritten text]*

OLIN CORPORATION  
ZON MTF  
EMERGENCY LAGOON  
GROUNDWATER MONITORING WELL  
QUARTERLY INSPECTION FORM

FIGURE 5

Capvent  
of  
daintoise

Well/ Piezometer	Survey Mark Present?		Standing or Ponded Water?	Evidence of Collision Damage?	Evidence of Frost Heaving?	Evidence of Casing De- gradation?	Lock in Place?	Evidence of Well Sub- sidence?	Inner Casing Material (Type)	Date Time Initials
Maintenance OMW- 101	Y	Y CV	N	N	N OK	N outer inner	Y	N	SS SCREEN PVC RISER	3/10/93 10:15 8 JB
Maintenance OMW- 102	Y	Y CV	N	N	N OK	N N	Y	N	SS SCREEN PVC RISER	3/10/93 10:45 13 JB
Downgradient OMW- 103	Y	N	Water in COVER	N	N OK	N N	Y	N	SS SCREEN PVC RISER	3/10/93 9:10 1 JB
Downgradient OMW- 104	Y	Y CV	N	N	N OK	N N	Y	N	SS SCREEN PVC RISER	3/10/93 10:20 9 JB
Maintenance OMW- 105	Y	Y CV	N	N	N OK	N N	Y	N	SS SCREEN PVC RISER	3/10/93 10:15 7 JB
Upgradient OMW- 106	Y	Y CV	N	N	N OK	N N	Y	N	SS SCREEN PVC RISER	3/10/93 8:00 5 JB
Maintenance OMW- 107	Y	Y CV	N	N	N OK	N N	Y	N	FULL SS	3/10/93 10:20 10 JB
Maintenance OMW- 108	Y	Y CV	N	N	N Soil Covered	N rusting	Y	N	FULL SS	3/10/93 4:30 6 JB
Downgradient OMW- 109	Y	Y CV	N	N	N OK	N N	Y	N	FULL SS	3/9/90 11:00 4 JB
Downgradient OMW- 110	Y	N	N	N	N OK	N N	Y	N	FULL SS	3/9/90 7:20 2 JB

DEATH CORRUPTION  
 ZONE - MTF  
 EMERGENCY H 16 LAGOON  
 GROUNDWATER MONITORING WELL  
 QUARTERLY INSPECTION FORM

FIGURE 5

Capvent  
 or  
 drain hole

Well/ Piezometer	Survey Mark Present?		Standing or Ponded Water?	Evidence of Collision Damage?	Evidence of Frost Heaving?	Evidence of Casing De- gradation?	Lock in Place?	Evidence of Well Sub- sidence?	Inner Casing Material (Type)	Date Time Photo Initials
Maintenance OMW- 111	Y	Y CV	N	N	N OK	N inner outer N	Y	N	FULL SS	3/9/93 9:40 3 JAS
Downgradient OMW- 112	Y	N	N	N	N OK	N N	Y	N	FULL SS	3/10/93 10:50 14 JAS
Downgradient OMW- 113	Y	Y CV	N	N	N OK	N N	Y	N	FULL SS	3/10/93 10:40 12 JAS
Downgradient OMW- 114	Y	Y CV	N	N	N OK	N N	Y	N	FULL SS	3/10/93 10:35 11 JAS

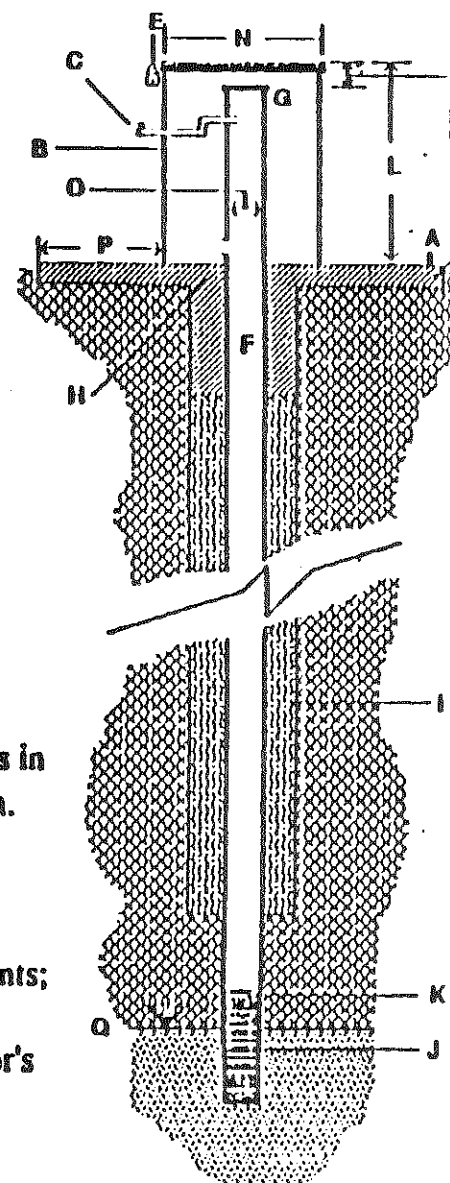
3. Obtain data on depth to standing water and depth to the bottom of each monitoring well and piezometer in the owner/operator's monitoring system. Record depth measurements to the nearest 0.01 feet. Record the measurements

Date	Well/ Piezometer I.D. No.	Depth to Water (0.01')	Depth of Well/ Piezometer (0.01')
3/9/93	OMW101	29.25	not taken during this round of sampling
3/9/93	OMW102	28.42	"
3/9/93	OMW107	32.47	"
"	OMW111	33.60	"
"	OMW103R	29.99	"
"	OMW104	30.83	"
"	OMW105	27.15	"
"	OMW106	22.92	"
"	OMW109	30.53	"
"	OMW110	28.70	"

**Key:**

- A - survey elevation mark
- B - protective outer casing
- C - gas vent
- D - concrete apron
- E - fitted lock
- F - primary casing material
- G - cap for primary casing
- H - bore hole seal
- I - annular space seal
- J - well screen
- K - filter pack
- L - height of riser
- M - elevation difference
- N - diameter of outer casing
- O - diameter of primary casing
- P - radius of apron
- Q - water level below surface

1. The field inspector has several options in collecting ground water elevation data. The inspector may:
  - a. obtain past data from the operating record; and/or
  - b. take his/her own depth measurements; and/or
  - c. obtain data from the owner/operator's sampling crew.



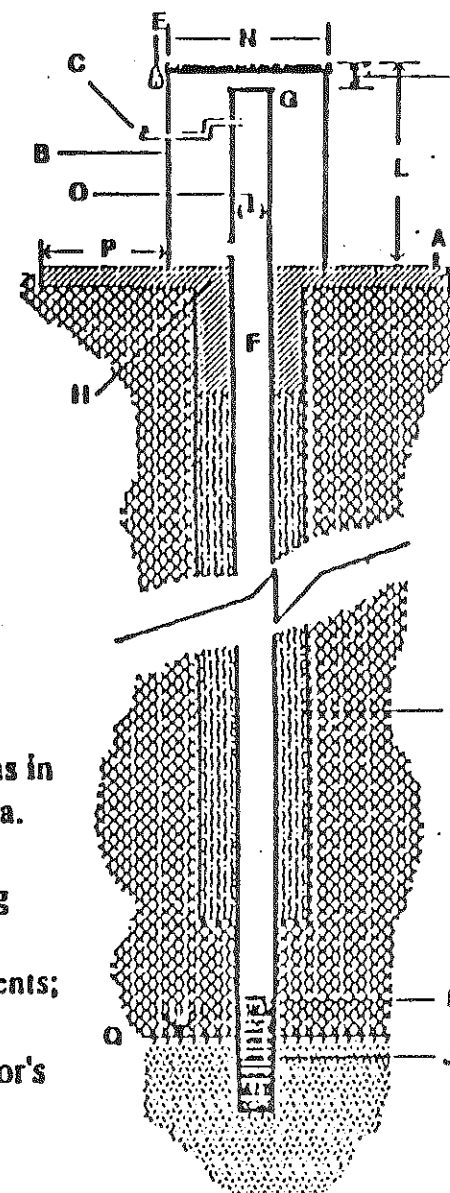
3. Obtain data on depth to standing water and depth to the bottom of each monitoring well and piezometer in the owner/operator's monitoring system. Record depth measurements to the nearest 0.01 feet. Record the measurements

Date	Well/ Piezometer I.D. No.	Depth to Water (0.01')	Depth of Well/ Piezometer (0.01')
3/9/93	OMW 112	35.55	not taken during this round of sampling
"	OMW 113	33.48	
"	OMW 114	35.02	

**Key:**

- A - survey elevation mark
- B - protective outer casing
- C - gas vent
- D - concrete apron
- E - fitted lock
- F - primary casing material
- G - cap for primary casing
- H - boro hole seal
- I - annular space seal
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- M - elevation difference
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1. The field inspector has several options in collecting ground water elevation data. The inspector may:
  - a. obtain past data from the operating record;and/or
  - b. take his/her own depth measurements; and/or
  - c. obtain data from the owner/operator's sampling crew.



several wells. Complete the following table for each well (Note: revise or add to the table if permit conditions dictate a different requirement the owner/operator must follow):

Position/Title	Name	Sampling Experience (years and type)
Environmental Scientist	Robert Sada	3 years
Senior Hydrogeologist	Rick Scott	10 years

Well Identification Number <u>OMW106</u>	Y/N	Photograph Taken Y/N
Did the sampling crew measure static water levels in the well and well depths prior to the sampling event? <u>well depths and from 2 in. rows - 20 ft</u>	Y	Y
Did the sampling crew use a steel tape or electronic device to take depth measurements?	Y	Y
Did the sampling crew record depths to +/- 0.01 feet?	Y	Y
Did the sampling crew follow these procedures: 1. remove locking and protective cap; 2. sample the air in the well head for organic vapors; - <u>NO</u> 3. determine the static water level; and 4. lower an interface probe into the well to detect immiscible layers.	N	N
If immiscible samples were collected, were they collected prior to well purging? <u>floaters or sinkers</u>	NA	N
Did the sampling crew evacuate low yielding wells to dryness prior to sampling?	Y	N
Did sampling crew evacuate high yielding wells so that at least three casing volumes were removed?	Y	N
Did the sampling crew collect the purge water for storage and analysis or for shipment off-site to a RCRA treatment facility?	Y	N
Were sampling devices constructed of fluorocarbon resins or stainless steel? <u>used polyethylene bottles</u>	N	N

(Continued)

Well Identification Number _____	Y/N	Photograph Taken Y/N
If the sampling crew used dedicated samplers, did they disassemble and thoroughly clean the devices between samples?	N/A	
----- If samples are collected for organic analyses, did the cleaning procedure include the following steps: 1. non phosphate detergent wash 2. tap water rinse 3. distilled/deionized water rinse 4. acetone rinse 5. pesticide-grade hexane rinse?	N/A	
----- If samples are collected for inorganic analyses, does the cleaning procedure include the following steps: 1. dilute acid rinse (HNO <sub>3</sub> or HCL) 2. distilled/de-ionized water rinse?	N/A	
Did the sampling crew take trip blanks, field blanks and equipment blanks? <i>2 blank dup per event</i>	Y	N
If the sampling crew used bailers, were they bottom valve bailers?	Y	N
If the sampling crew used bailers, was "teflon" coated wire, single strand stainless steel wire or monofilament used to raise and lower the bailer? <i>nylon rope</i>	N	N
If the sampling crew used bailers, did they lower the bailer slowly to the well?	Y	N
If the sampling crew used bailers, were the bailer contents transferred to the sample container to minimize agitation and aeration?	Y	N
Did the sampling crew take care to avoid placing clean sampling equipment, hoses, and lines on the ground or other contaminated surfaces prior to insertion in the well? --	Y	N
If the sampling crew used dedicated bladder pumps: Was the compressed gas from an oilless compressor certified quality commercial compressed gas cylinder? If not, was a suitable oil removal purification system installed and maintained?	N/A	N
----- Was the bladder pump controller capable of throttling the bladder pump discharge flow to 100 ml/min or less for continuous periods of at least 20-30 seconds without restricting liquid discharge?	N/A	



Item Identification Number	Y/N	Autologous Taken Y/N
Were samples taken from the bladder pump discharge tube, and not from any purge device discharge tube?	N/A	
Was the bladder pump discharge flow checked for the presence of gas bubbles before each sample collection, as a test for bladder integrity?	N/A	
Was bladder pump flow performance monitored regularly for dropoff in flow rate and discharge volume per cycle?	N/A	
Was the bladder pump incorporated in a combination sample-purge pump design which can expose the bladder pump interior and discharge tubing to the pump drive gas? If so, were operating procedures established and followed to prevent at all times the entry of drive gas into the sample flow or into the bladder pump interior?	N/A	
Did the sampling crew collect and containerize samples in the order of the volatilization sensitivity of the parameters?	Y	N
Did the sampling crew measure the following parameters in the field: pH, temperature, specific conductance?	Y	N
Did the sampling crew sample background wells before sampling downgradient wells?	Y	Y
Did the sampling crew use fluorocarbon resin or polyethylene containers with polypropylene caps for samples requiring metals analysis? NALGENE	Y	N
Did the sampling crew use glass bottles with fluorocarbon resin-lined caps for samples requiring metals analysis? <i>metals</i>	N	N
If metals were the analytes of concern, did the sampling crew use containers cleaned with nonphosphate detergent and water, and rinsed with nitric acid, tap water, hydrochloric acid, tap water and finally Type II water? <i>lab prepared bottles</i>	Y	N
If organics were the analytes of concern, did the sampling crew use containers cleaned with nonphosphate detergent, rinsed with tap water, distilled water, acetone, and finally pesticide quaility hexane? <i>lab prepared bottles</i>	Y	N
Did the sampling crew filter samples requiring analysis for organics? <i>filter on metals only</i>	N	N

# COMMENTS ON SAMPLING PROGRAM

RECEIVED  
WMD RCRA  
JAN 21 1993

Illinois Environmental Protection Agency  
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL 0006271696 IEPA #: 1190200002  
 Facility Name: Olin Corp - Main Plant Phone #: 618-258-5038  
 Street Address: 427 N. Shamrock Street County: Madison  
 City: East Alton State: Illinois Zip: 62024  
 Region: 6 Inspection Date: 12/10/92 From: 9:30 To: 4:00  
 Weather: ~55°F Rainy

TYPE OF FACILITY

Notified As: G/TR/TSD Regulated As: G/TR/TSD  
 LDF? Yes HPV? no 90-Day F/U Required?: YES X NO    

TYPE OF INSPECTION

CEI: X Sampling:     Citizen Complaint:     Closed:     Other:      
 CME/O&M:     Record Review:     Follow-Up to Inspection of:     Withdrawal:    

NON-REGULATED STATUS

SQG:     Claimed Nonhandler:     Other (Specify in Narrative):    

PART A

Notification Date: 8/18/80, from (Initial) or (subsequent) Notification.  
 Initial Part A Date: 11/18/80 Amended: 11/07/90 (TCLP)  
 Part A Withdrawal requested:     /     /     Approved by (US)(IL) EPA:     /     /    

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N 11/06/90 Final Permit Issued: 04/03/90  
Zone 3 Incineration Site 4-20 only

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N     /     /      
 Illinois Attorney General: Y or N     /     /     County State's Attorney: Y or N     /     /    

ORDERS ISSUED

CACO:     /     /     CAFO:     /     /     Consent Decree:     /     /      
 Federal Court Order:     /     /     State Court Order:     /     /     IPCB Order:     /     /    

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?		Activity Conducted Prior to 1980?		Closed	Being done at Time of Insp?	Exempt from 35 IAC, Sec.	On Annual Report		
	Yes	No	Yes	No				1989	1990	1991
S01	Yes	N/A	yes	no*	yes	no		yes	yes	yes
T01	"	"	"	no*	yes	Some exempt pursuant to 725.101(c)(10)		yes	N/A	N/A
S03	"	"	"	Pursuing closure	no	no		not used since 1981-1982		
S04	"	"	"	Pursuing extended cl.	no	no		not used since 1987		
T03	"	"	"	no*	yes	no		yes	yes	yes
T04	"	"	"	N/A*	yes	yes waste reclassified as non-HAZ.		N/A	N/A	N/A

**OWNER****OPERATOR**

Name <i>Olin Corporation</i>	Name <i>Same</i>
Address <i>427 N. Shamrock St.</i>	Address
City <i>East Alton</i>	City
State <i>Illinois</i> Zip <i>62024</i>	State Zip
Phone # <i>618-258-5038</i>	Phone #

**PERSON(S) INTERVIEWED****TITLE****PHONE #**

<i>Lou Pattan</i>	<i>Sr. Engineering Technician</i>	<i>618/258-5728</i>
<i>Jeff Smith</i>	<i>Senior Env. Technician</i>	<i>618/258-5772</i>

**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

<i>Chris Cahnovsky</i>	<i>IEPA / EPS</i>	<i>618/346-5120</i>
<i>Gina Search</i>	<i>IEPA / LSCT</i>	<i>618/346-5120</i>
<i>Eric Minder</i>	<i>IEPA / EPE</i>	<i>217/524-3274</i>
<i>Clarence Smith</i>	<i>IEPA / EPE</i>	<i>217/524-3266</i>

**PREPARED BY****AGENCY/TITLE****PHONE #**

<i>Chris Cahnovsky</i>	<i>IEPA / EPS</i>	<i>618/346-5120</i>
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**SUMMARY OF APPARENT VIOLATIONS**

Area	Class	Section
<i>DOR</i>	<i>I</i>	<i>703.121(a)(2)</i>
<i>specifically</i>		<i>PART B Permit</i>
		<i>Section II (B) 2)</i>
<i>DGS</i>	<i>II</i>	<i>725.116(d)(2)</i>

Area	Class	Section

Area	Class	Section

Facility No: Ohio Corporation: Mun Plant  
 USEPA #: IL D 0 0 6 2 7 1 6 9 6  
 IEPA #: 1 1 9 0 2 0 0 0 0 2

# WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #			On Annual Report for: (Circle if present; cross out if not present)			Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition			
			* On 8700-12	* On 3510-3	* 19	* 19	* 19	* 19							
WWT Sludge	Winchester WWTP at Zone 6.	8/4/92	FO06 DO08 K046	y	y	(G)	(G)	(G)	F	F	F	40 yd <sup>3</sup>	76,760 gal per year	12/8/92	Pearia Disposal Co. Heritage
Bag house Dust	All Bag House Units	4/24/91	DO08	y	y	(G)	(G)	(G)	F	F	F	7 yd <sup>3</sup>	40,602 gal per year	n/a	sent to WWTP for lime usage
Plating Waste	Site 1-1 Bullet Plating	5/4/92	FO07 FO08 FO09	y	y	(G)	(G)	(G)	F	F	F	-0-	330 gal per year	10/1/92	Cyanchem Also direct to waste zone to WWTP Detroit Michigan
Incinerator Ash	Zone 3 Incinerator	1/21/92	DO08	y	y	(G)	(G)	(G)	F	F	F	5-15 yd <sup>3</sup> r/lots	301,940 gal per year	5/29/92	Litchfield-Hillsboro Landfill. Montgomery County
Tumbling Media	Lead Cont. Waste from Bullet burnishing	4/24/92	DO08	y	y	(G)	(G)	(G)	F	F	F	-0-	51,308 gal per year	11/25/92	Pearia Disposal General Battery Reading, PA (recycler)
Spent Solvent	Cleaning, Cutting Degreasing	3/19/92	FO01 FO02	y	y	(G)	(G)	(G)	F	F	F	Chlorinated 165 gal Nonchlor 230	6435 gal per year	11/24/92	Safety-Kleen New Castle, Ky
Ballistic Sand	Sand Cont. lead from firing range	4/3/92	DO08	y	y	(G)	(G)	(G)	F	F	F	-0-	666 gal per year	12/6/92	Pearia Disposal General Battery Reading, PA
Mercury Cont. Ammo & Debris	Qa/Qc of Ammo (DOD Requirement)	4/20/92	DO09	y	y	(G)	(G)	(G)	F	F	F	275 gal	846 gal per year	12/11/91	TWI
Waste Petroleum Naptha	Safety Kleen Parts Washers	Supplied by S-K	DO01	y	y	(G)	(G)	(G)	F	F	F	S-K	7053 gal per year	11/24/92	Safety-Kleen Caseyville, IL
Lead Cont. Scrap	Nads, shots (filters) debris	3/19/92	DO08	y	y	(G)	(G)	(G)	F	F	F	3 yd <sup>3</sup>	4848 gal per year	9/9/92	CWM Emelle

\* All "NO" responses must be explained in narrative.

5/19/92 DO01 y y

(C) -0- 1818 gal per year 9/9/92 CIVIL Emelle

## REMARKS

1190200002 - Madison County  
Olin Corp. Main Plant  
ILD006271696

Olin Corporation, located in East Alton, Illinois, has two manufacturing facilities referred to as the Winchester Group and the Brass Group. Small arms ammunition, primer explosives and other ammunition related products are manufactured by the Winchester Group. The Brass Group manufactures copper base alloy products. Regulated hazardous waste activities at this facility included storage in drums (S01), storage and treatment in tanks (S02, T01), storage in surface impoundment (S04), incineration (T03), and treatment in other devices (T04), i.e., hammermills and rotary destruct furnace. Types of waste generated are lead contaminated filters and baghouse dust, plating waste, explosive wastes, wastewater treatment sludge, scrap ammo, incinerator ash and spent solvents.

On April 2, 1990, a Part B permit was issued to Olin for container storage of mercury contaminated ammo at Site 4-2(a). This permit became effective on May 5, 1991 and was revised April 22, 1991. The revision was made to include the storage of mercury contaminated debris. This permit stated that a container storage area was to be constructed at Site 4-2(a). This structure was put into service on September 26, 1991, and was in use at the time of the December 10, 1992 inspection.

On December 9, 10 and 11, 1992, Chris Cahnovsky and Gina Search (IEPA/FOS), Eric Minder, Clarence Smith, Ron Huett and Scott Hacke (IEPA/Permits) conducted an inspection at Olin Corporation's Main Plant. Also present during this inspection were Louis Pattan and Jeff Smith, representing Olin Corp. The annual report, manifests and waste stream analysis were reviewed on December 9, 1992, before the plant walk-through inspection was completed. During this review, two manifests did not have the proper Land Disposal Notification Forms attached. However, the proper notifications were supplied to the inspectors, so no violation was alleged.

During the plant inspection, the following Sites were observed:

### ZONE 1

SITE 1-1 Bullet Plating Facility (Zone 1) - This unit discharges to the Winchester wastewater treatment system pursuant to the facility's NPDES permit. Two areas of the Bullet Plating Facility were inspected, the cyanide kill tank, part of the cyanide destruct unit system and the cyanide accumulation pad.



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Olin Corp. Main Plant  
ILD006271696  
Page 2 of 5

Both of these units are currently undergoing closure. Once closure is completed, they will continue to be used as a 90 day accumulation point. No waste was present at this site during this inspection. Records are kept for both the cyanide accumulation pad and the cyanide kill tank. No discrepancies were found.

SITE 1-9 Analytical Lab Spent Solvent accumulation point (Zone 1) - This site is located within Zone 1 and is the location where spent solvent from the lab is accumulated for less than 90 days. Two 55 gallon drums of chlorinated and four 55 gallon drums of nonchlorinated solvents were observed at this site. These drums were properly stored, labeled and dated. While reviewing the training records, no job descriptions were available for the persons receiving training at this site. This is an apparent violation of 725.116(d)(2).

#### ZONE 4

SITE 4-9 Lead contaminated tumbling media (Winchester Zone 4) - This area is where lead contaminated tumbling media is accumulated in 1 cubic yard boxes for a period of less than 90 days. No waste was present at this site. Operating, inspection and training records were observed at this site.

SITE 4-8 This is a satellite accumulation area for chlorinated spent solvent. One 55 gallon satellite drum of solvent was observed at this site. This waste is no longer generated at this site. This satellite drum will be the last one at this site.

SITE 4-2(a) Manufacturing Reclamation Facility (MRF - Zone 4) -

1) Fenced Storage Area - This area is currently going through closure. No waste has been placed in this area since January 17, 1992.

2) The Spent Solvent Storage Area is currently undergoing closure and is now used as a 90 day accumulation point. This area receives spent solvent from several Zones. No waste was observed at this site.

3) Two 40-foot semi trailers were observed at this site. Only one of the trailers contained any waste. It contained three 1 cubic yard boxes of lead contaminated scrap. All under 90 days.

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Olin Corp. Main Plant  
ILD006271696  
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4) A building has been constructed at this site to store mercury contaminated ammo and debris. It was put into service on September 26, 1991. At the time of this inspection, two 55 gallon drums (S01) of mercury contaminated ammo were observed. Mercury contaminated debris is also stored at this site. Three 55 gallon drums (S01) of mercury contaminated debris were observed. According to the Part B permit issued to Olin Corporation, the mercury contaminated debris is to be stored in 4.5 gallon boxes at this site. All records were reviewed at this site and no discrepancies were found.

At the time of this inspection, no waste had exceeded a storage date of one year. However, one 55 gallon drum (S01) of mercury contaminated debris was dated December 13, 1991. Olin is in the process of locating a treatment facility to handle this type of waste. Olin stated that they could have it land disposed immediately, but wanted to pursue treatment rather than land disposal. Olin stated they would forward a copy of all documentation pursuant to 728.150 to the Collinsville FOS Office (attached).

#### ZONE 6

SITE 1-11 Winchester Waste Water Treatment Plant (Zone 6) - Sludge is accumulated at this site in 15 cubic yard roll-off containers. At the time of this inspection, approximately 35 cubic yards of sludge were observed. All under 90 days. Olin is currently using baghouse dust generated from the Zone 3 incinerator at the WWTP to raise the pH of the influent from 1.8 to 6.5.

The Zone 6 surface impoundment is undergoing closure. However, delayed closure is being proposed at this unit. This will allow Olin to continue using the impoundment for non-hazardous wastewater, while groundwater monitoring will be on-going. Upon observation, the lagoon contained a small amount of rainwater. The facility continues doing daily inspections and employee training as it relates to the lagoon. The lining system in this lagoon has been upgraded since last the inspection.



1190200002 - Madison County  
Olin Corp. Main Plant  
ILD006271696  
Page 4 of 5

### ZONE 3

SITE 3-1 Zone 3, Site 3-1, Incinerator - Olin is attempting to obtain a Part B permit for the two incinerators located at Zone 3-1. Olin is currently burning hazardous waste under interim status. The Zone 3-1 incinerators are being operated to burn the following explosives containing hazardous wastes:

Amount Burned From  
Jan-Nov 1992

1. Primer Mix Scrap - Class A Explosives	73,309 lb
2. Smokeless Powder Scrap - Class B Explosive	219,171 lb
3. Nitrocellulose Scrap - Ignitable Waste	14,289 lb

These wastes are being accumulated in five gallon water filled pails in a specially designed room. All pails were labeled and dated.

In addition to these hazardous wastes, the facility will also incinerate combustible factory trash. This is the primary purpose of the two incinerators which generate steam through the use of two-heat boilers.

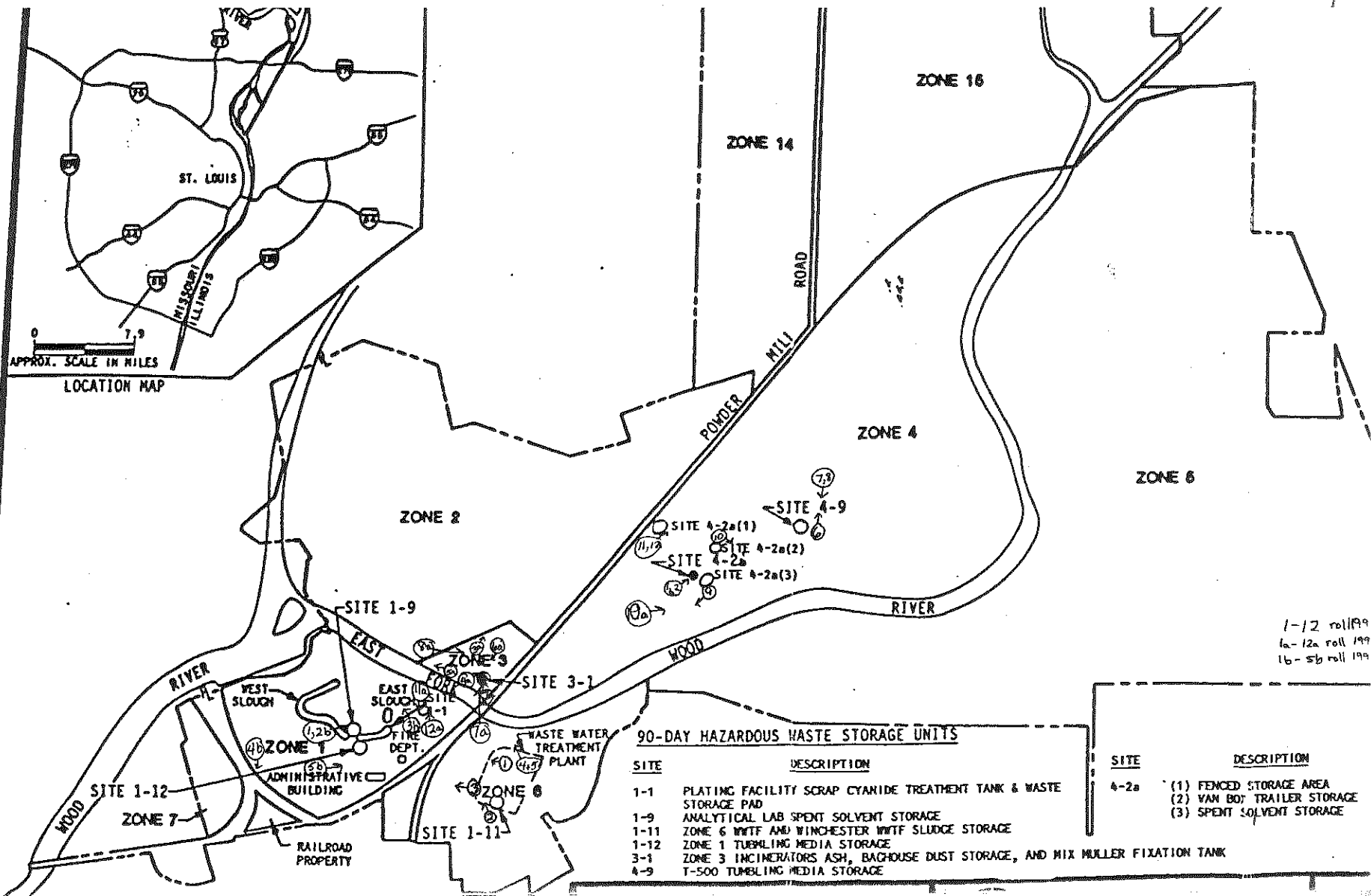
Since May, 1992, Olin has been treating their incinerator ash with super triple phosphate to render it non-hazardous per TCLP. Super triple phosphate binds the lead and cadmium. This waste is then sent to the Litchfield-Hillsboro Landfill. Olin intends to sample every roll-off box for a period of one year and then randomly thereafter. A waste analysis plan for this treatment was submitted to the Agency on April 13, 1992 and the proper notification, are attached to each out going manifest.

During the inspection of this facility, the following discrepancies were observed:

Olin's Part B permit states that the mercury contaminated debris will be stored in 4.5 gallon boxes at site 4-2(a). This inspection revealed that the mercury contaminated debris is being stored in 55 gallon drums (S01). This is an apparent violation of Section 703.121(a)(2) specifically, and the Part B permit issued April 2, 1990, revised April 22, 1991, Section II(B)(2).

1190200002 - Madison County  
Olin Corp. Main Plant  
ILD006271696  
Page 5 of 5

A written job description for each job position must be included in the training records at site 1-9. No job descriptions were observed during this inspection. This is an apparent violation of 725.116(d)(2).



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - 1-11

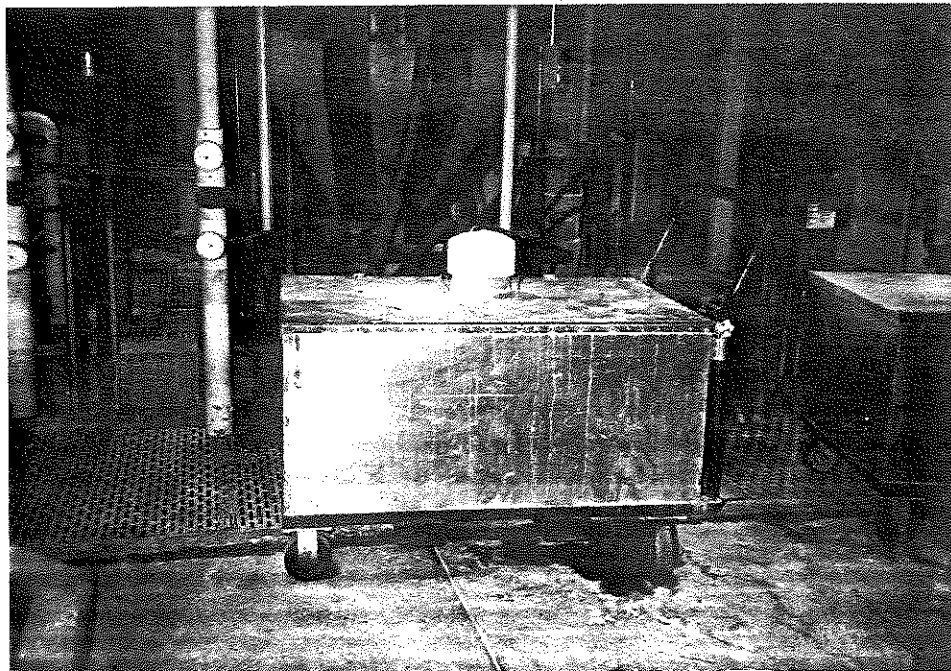
PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1992 PHOTO# 1

PHOTOGRAPH BY:

*Chris Cahnovsky*



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - 1-11

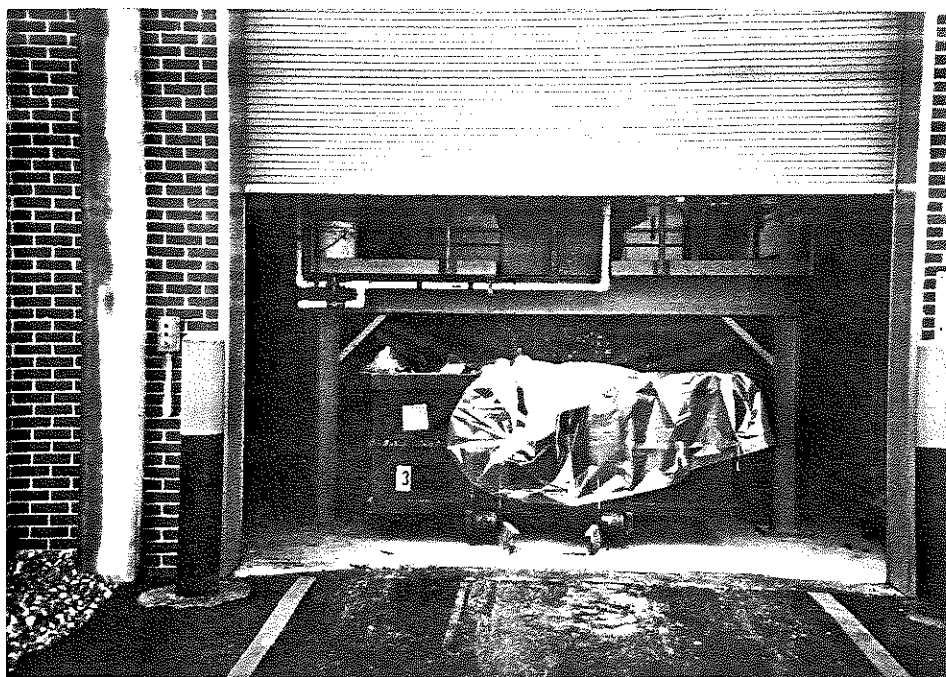
PHOTOGRAPH TAKEN TOWARD THE:

North Northwest

ROLL# 1992 PHOTO# 2

PHOTOGRAPH BY:

*Chris Cahnovsky*



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - 1-11

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1992 PHOTO# 3

PHOTOGRAPH BY:

*Ch. Chouvy*



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - Lagoon

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 1992 PHOTO# 4

PHOTOGRAPH BY:

*Ch. Chouvy*



DATE: December 10, 1992

TIME: 9:30 - 4:00

ID. 1190200002

Madison County

E. Alton - Olin - Lagoon

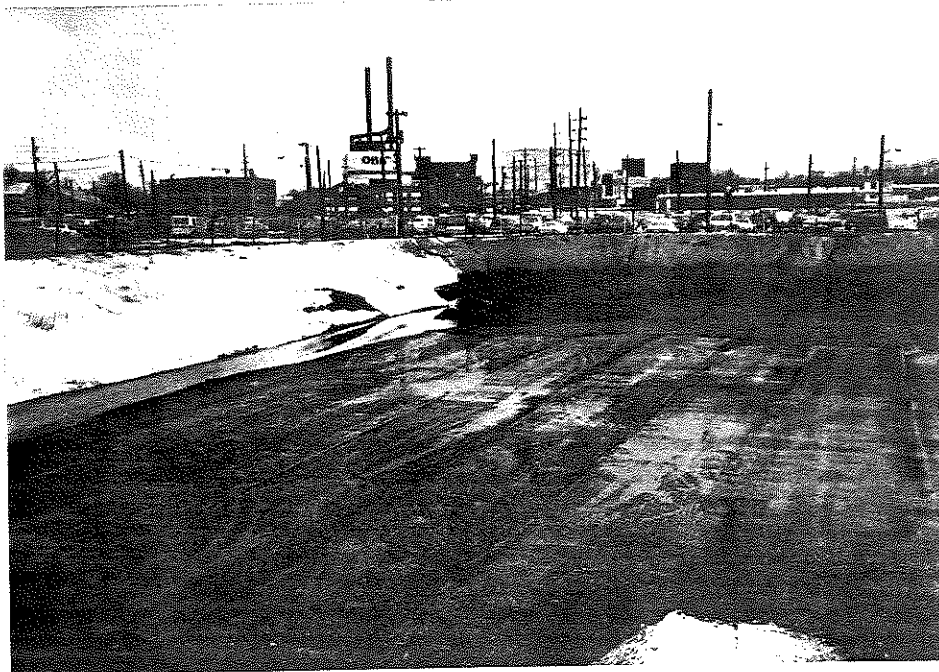
PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 1992 PHOTO# 5

PHOTOGRAPH BY:

*Ch. Ahn*



DATE: December 10, 1992

TIME: 9:30 - 4:00

ID. 1190200002

Madison County

E. Alton - Olin - Site 4-9

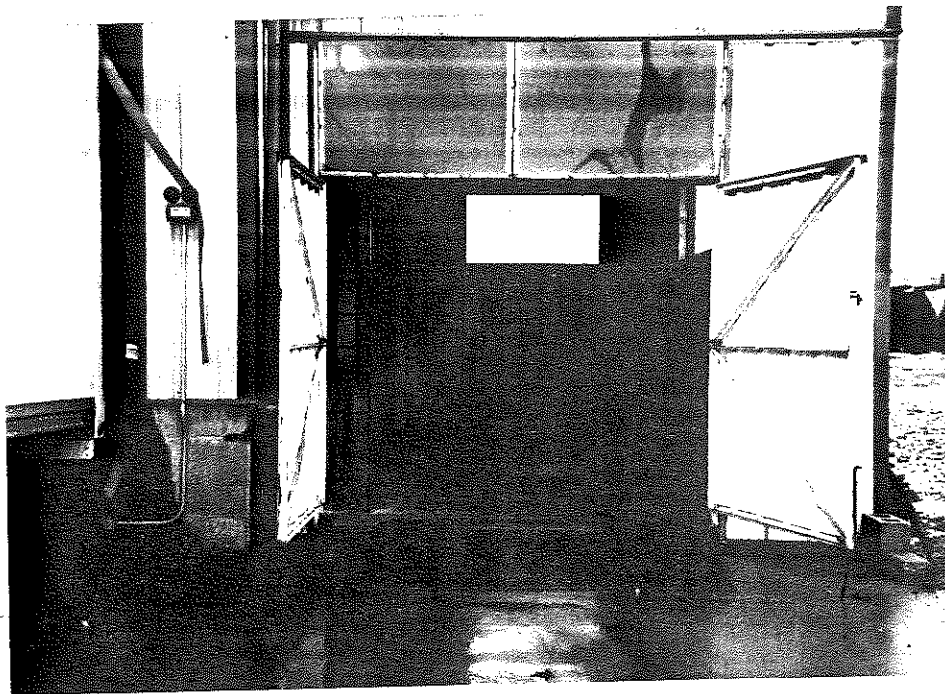
PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1992 PHOTO# 6

PHOTOGRAPH BY:

*Ch. Ahn*



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - Site 4-8

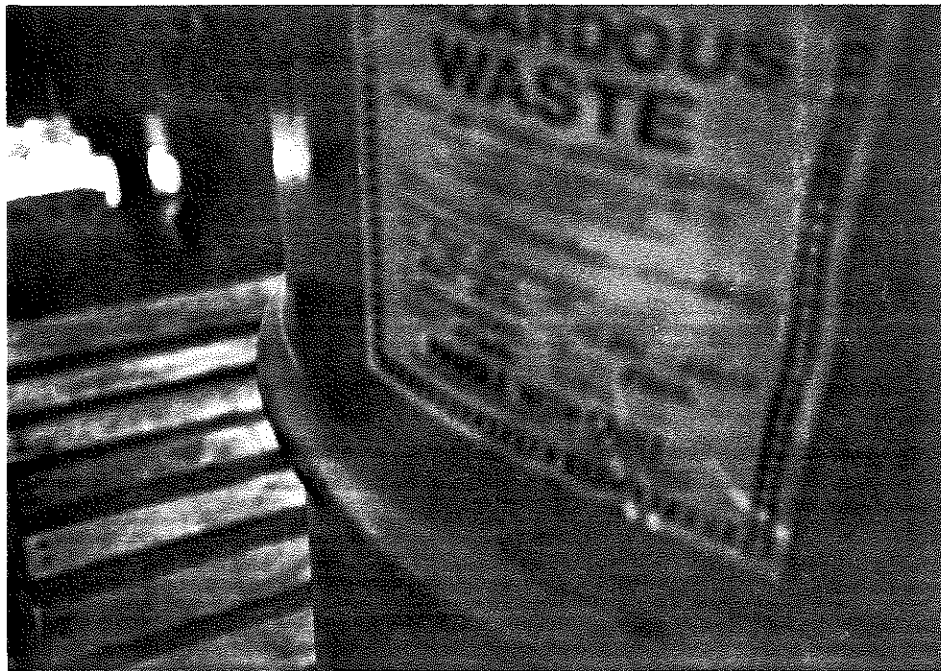
PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 1992 PHOTO# 7

PHOTOGRAPH BY:

*Ch. Chouvy*



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - Site 4-8

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 1992 PHOTO# 8

PHOTOGRAPH BY:

*Ch. Chouvy*





DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - Site 4-2a

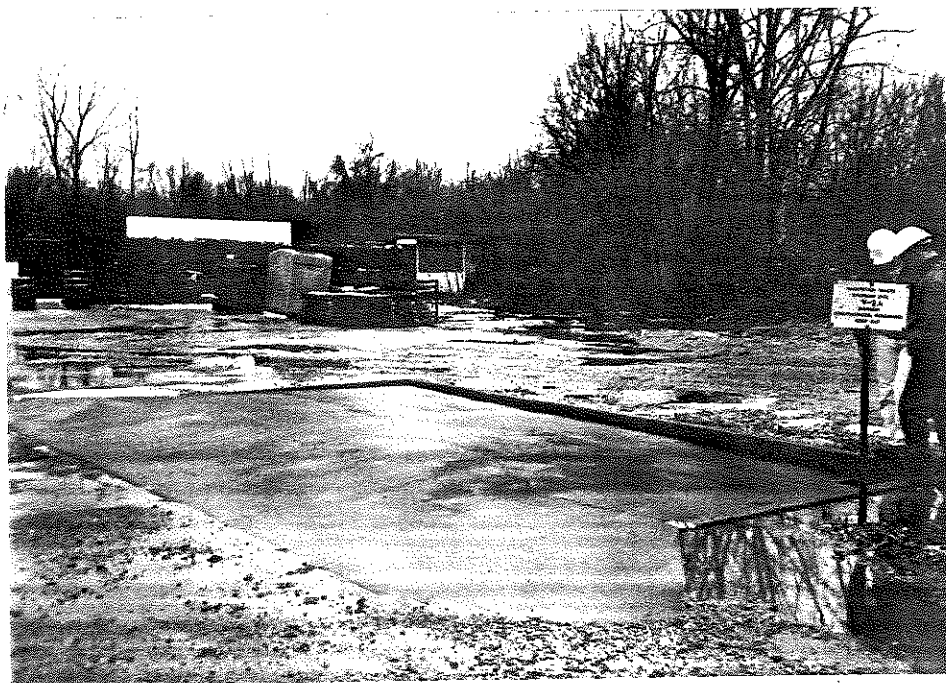
PHOTOGRAPH TAKEN TOWARD THE:

Southwest

ROLL# 1992 PHOTO# 9

PHOTOGRAPH BY:

*Ch. Charnock*



ATE: December 10, 1992

IME: 9:30 - 4:00

.D. 1190200002

Madison County

E. Alton - Olin - Site 4-2a

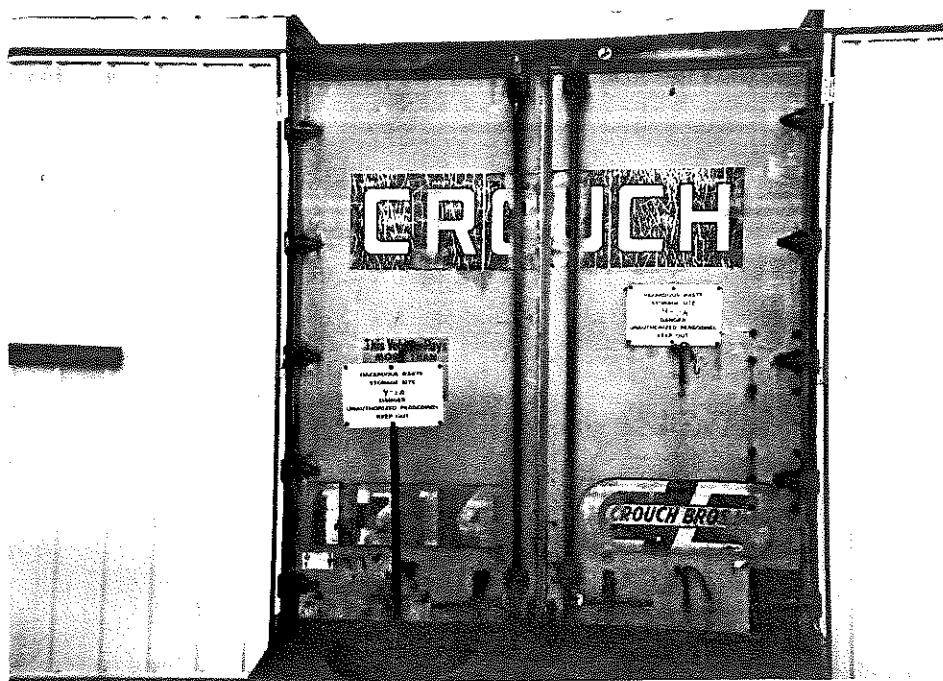
HOTOGRAPH TAKEN TOWARD THE:

Southeast

OLL# 1992 PHOTO# 10

HOTOGRAPH BY:

*Ch. Charnock*





DATE: December 10, 1992

TIME: 9:30 - 4:00

.D. 1190200002

Madison County

E. Alton - Olin - Site 4-2a

PHOTOGRAPH TAKEN TOWARD THE:

North

OLL# 1992 PHOTO# 11

PHOTOGRAPH BY:

*Ch. Chouzy*

DATE: December 10, 1992

TIME: 9:30 - 4:00

.D. 1190200002

Madison County

E. Alton - Olin - Site 4-2a

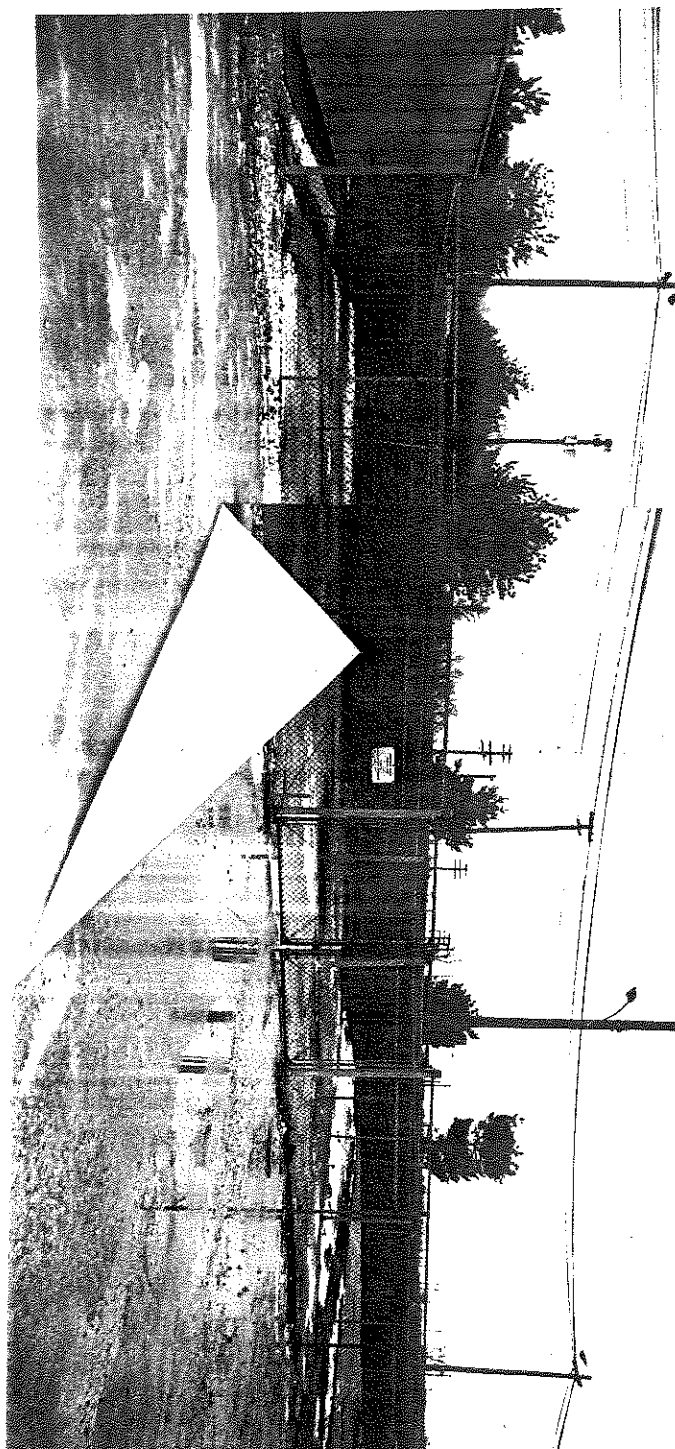
PHOTOGRAPH TAKEN TOWARD THE:

North

OLL# 1992 PHOTO# 12

PHOTOGRAPH BY:

*Ch. Chouzy*



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - Site 4-2a

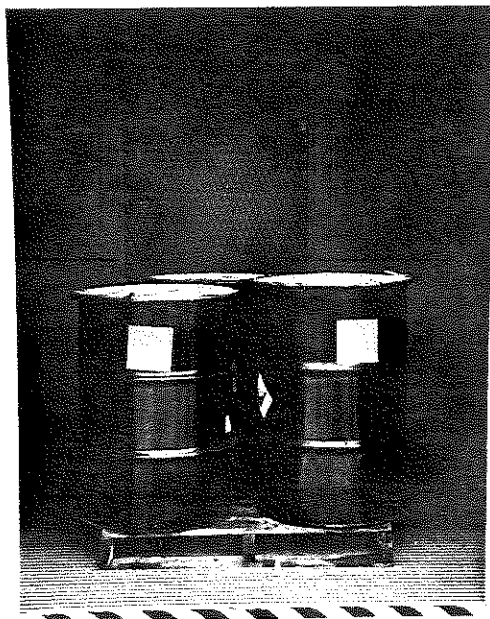
PHOTOGRAPH TAKEN TOWARD THE:

Northeast

ROLL# 1992 PHOTO# 1

PHOTOGRAPH BY:

*Ch. Chmura*



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - 4-2a

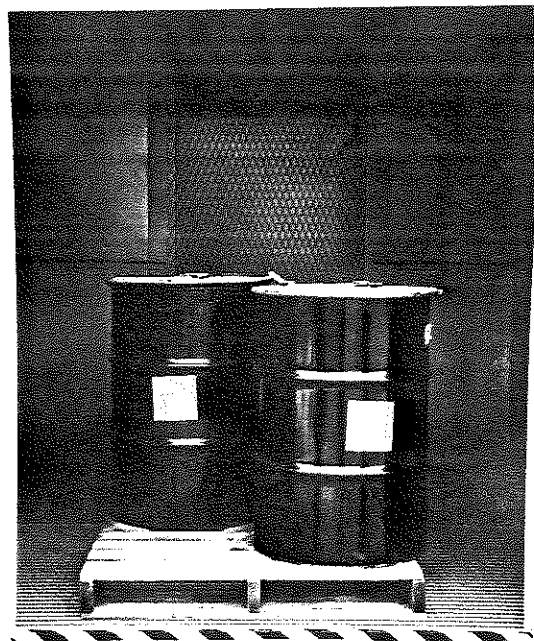
PHOTOGRAPH TAKEN TOWARD THE:

Northeast

ROLL# 1992 PHOTO# 2

PHOTOGRAPH BY:

*Ch. Chmura*



County

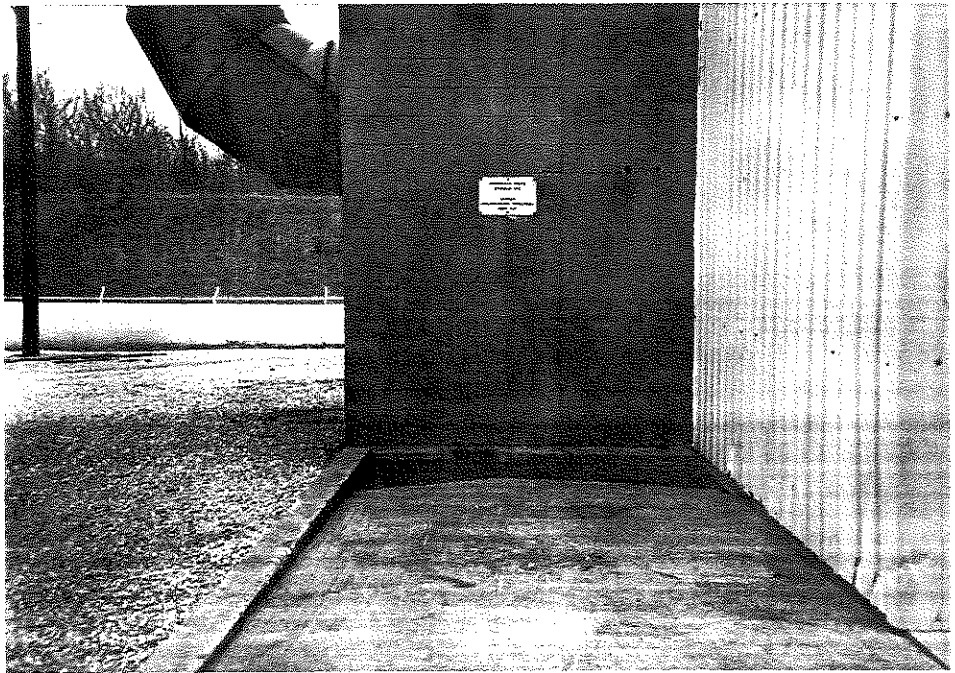
in - Site 1-1

JWARD THE:

PHOTO# 12

BY:

*Chow*



DATE: \_\_\_\_\_

TIME: \_\_\_\_\_

I.D. \_\_\_\_\_

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# \_\_\_\_\_ PHOTO# \_\_\_\_\_

PHOTOGRAPH BY:

DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - Zone 3

PHOTOGRAPH TAKEN TOWARD THE:

Northeast

ROLL# 1992 PHOTO# 3

PHOTOGRAPH BY:

*Ch. Chmura*



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - Zone 3

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 1992 PHOTO# 4

PHOTOGRAPH BY:

*Ch. Chmura*



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - Zone 3

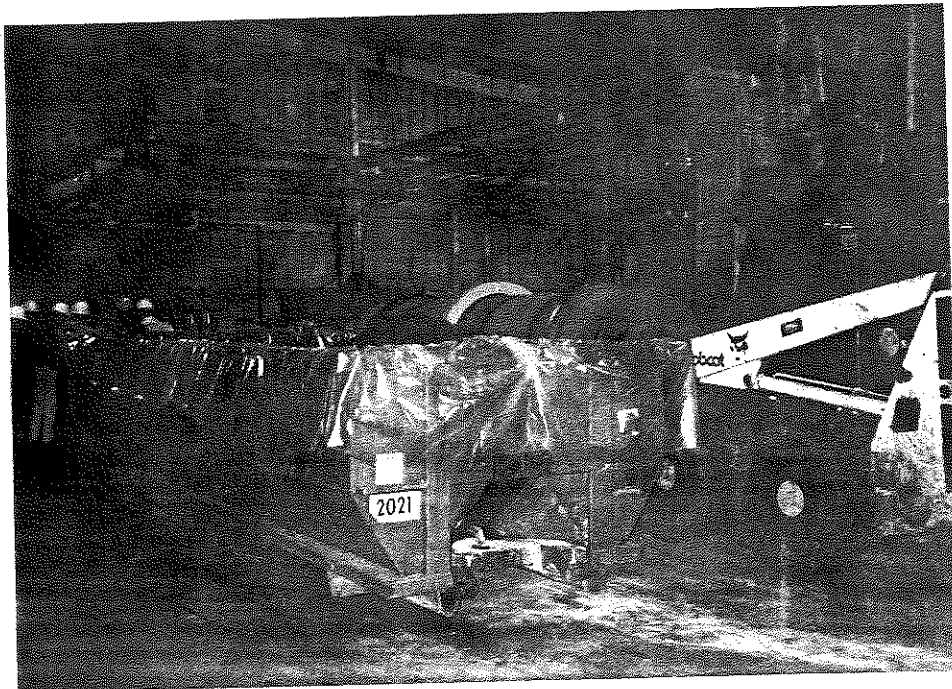
PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1992 PHOTO# 5

PHOTOGRAPH BY:

*Ch. Chmura*



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - Zone 3

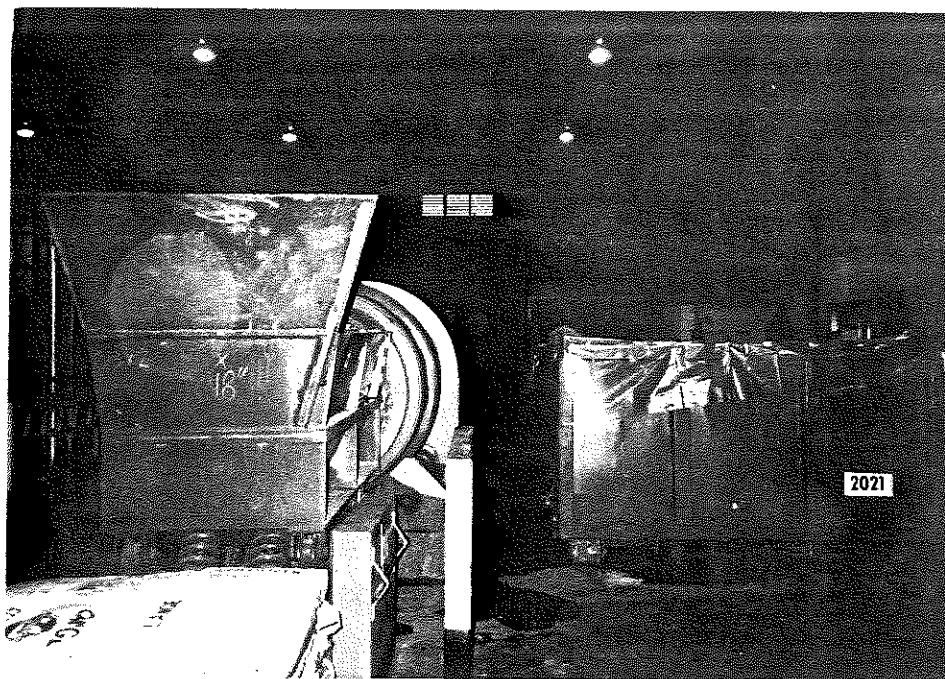
PHOTOGRAPH TAKEN TOWARD THE:

Southwest

ROLL# 1992 PHOTO# 6

PHOTOGRAPH BY:

*Ch. Chmura*



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - Site 3-1

PHOTOGRAPH TAKEN TOWARD THE:

North

OLL# 1992 PHOTO# 7

PHOTOGRAPH BY:

*Ch. Chausky*



DATE: December 10, 1992

TIME: 9:30 - 4:00

D. 1190200002

Madison County

E. Alton - Olin - Zone 3

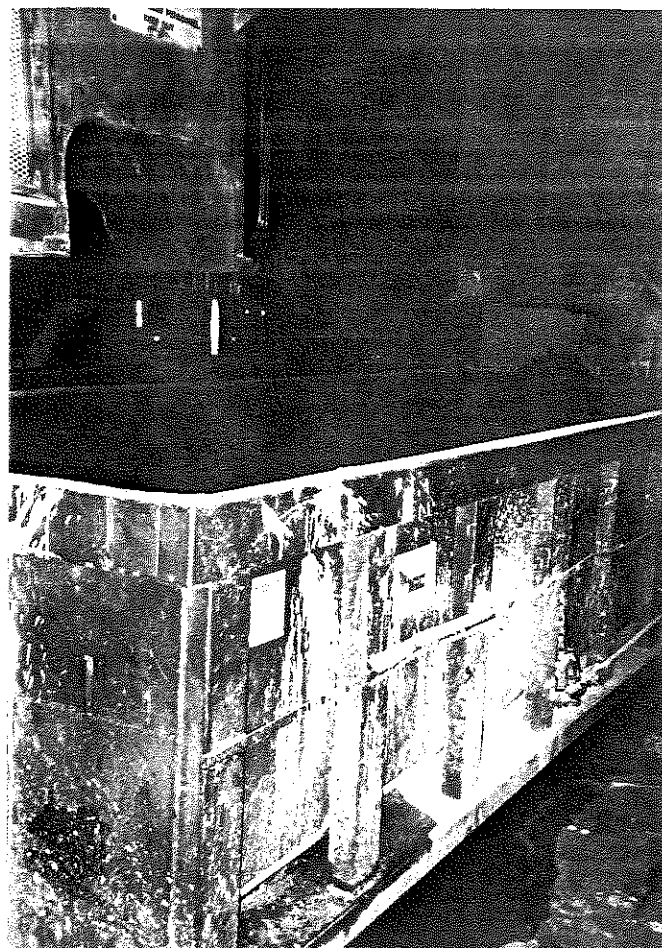
PHOTOGRAPH TAKEN TOWARD THE:

East

OLL# 1992 PHOTO# 8

PHOTOGRAPH BY:

*Ch. Chausky*





DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

E. Alton - Olin - Site 4-2a

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 1992 PHOTO# 10

PHOTOGRAPH BY:



DATE: December 10, 1992

TIME: 9:30 - 4:00

I.D. 1190200002

Madison County

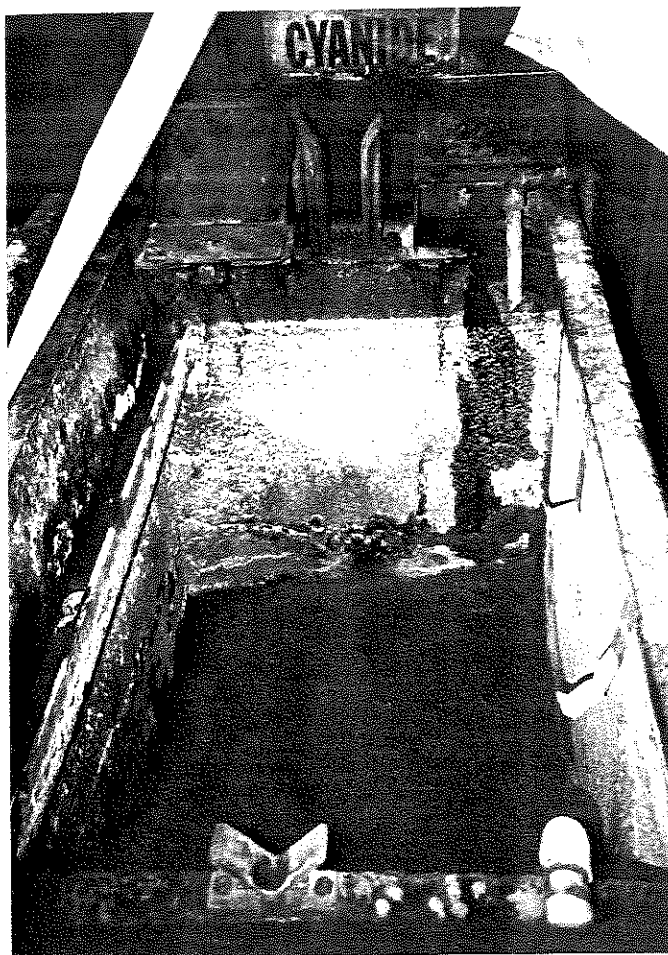
E. Alton - Olin - Site 1-1

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 1992 PHOTO# 11

PHOTOGRAPH BY:



ATE: December 11, 1992

IME: 8:30 - 11:30 a.m.

.D. 1190200002

Madison County

E. Alton - Olin - Site 1-9

HOTOGRAPH TAKEN TOWARD THE:

East

OLL# 1991 PHOTO# 1

HOTOGRAPH BY:  
*Ch. Chausy*

ATE: December 11, 1992

IME: 8:30 - 11:30 a.m.

.D. 1190200002

Madison County

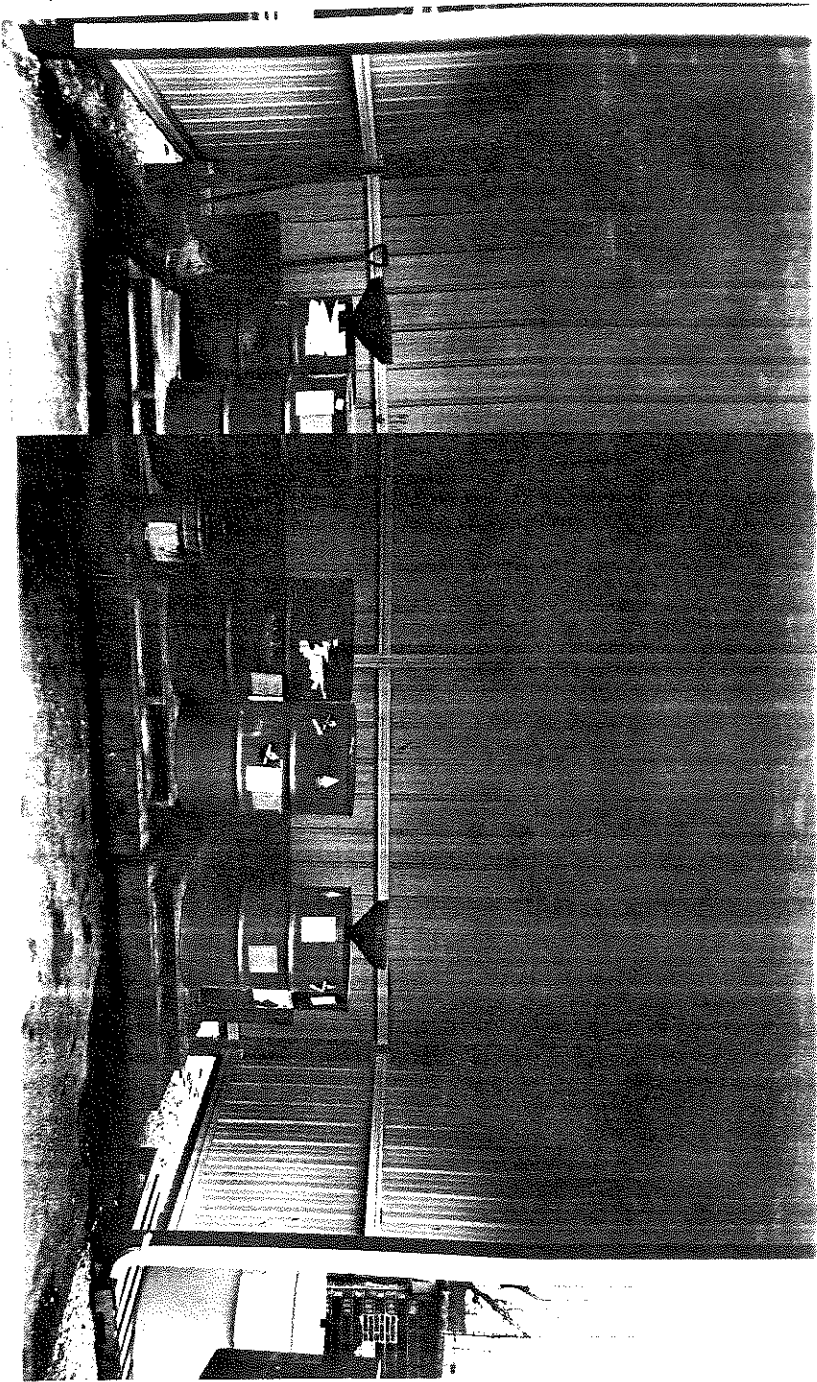
E. Alton - Olin - Site 1-9

HOTOGRAPH TAKEN TOWARD THE:

East

OLL# 1991 PHOTO# 2

HOTOGRAPH BY:  
*Ch. Chausy*





DATE: December 11, 1992

TIME: 8:30 - 11:30 a.m.

I.D. 1190200002

Madison County

E. Alton - Olin - Site 1-13

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 1991 PHOTO# 3

PHOTOGRAPH BY:



DATE: December 11, 1992

TIME: 8:30 - 11:30 a.m.

I.D. 1190200002

Madison County

E. Alton - Olin - Site 1-14

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 1991 PHOTO# 4

PHOTOGRAPH BY:



DATE: December 11, 1992

TIME: 8:30 - 11:30 a.m.

I.D. 1190200002

Madison County

E. Alton - Olin - Site 1-2

PHOTOGRAPH TAKEN TOWARD THE:

East

ROLL# 1991 PHOTO# 5

PHOTOGRAPH BY:

*Ch. Chausy*



DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			<b>PART 703</b> <b>RCRA PERMIT PROGRAM</b> <b>Subpart B: Prohibitions</b>  <b>Section 703.121: RCRA Permits</b>				Site 4-2(a) has RCRA PART B permit.  Zone 3 incinerator is seeking A Part B permit.  → Hg Contam. leak is being stored in 55 gallon drums
				a Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:  1) With a RCRA permit for the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  2) In conformance with all conditions imposed by the RCRA permit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>  b Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  b Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

PER-B-1

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21 DEC 1992  
IEPA/DLPC

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<b>PART 703</b> <b>RCRA PERMIT PROGRAM</b> <b>Subpart C: Authorization by Rule and Interim Status</b>  <b>Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications</b>	X			
			a	<p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

PER-C-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				<b>Section 703.151: Application by New HWM Facilities</b>  For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  Is the facility only operating with a RCRA permit? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>  <b>NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.</b>			<input checked="" type="checkbox"/>	
OTH	1				<b>Section 703.152: Amended Part A Application</b>  Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:  1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  <b>NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</b>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p><b>Section 703.154: Prohibitions During Interim Status</b></p> <p>During interim status, has the facility refrained from:</p> <p>a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1			<p><b>Section 703.155: Changes During Interim Status</b></p> <p><u>NOTE:</u> Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.</p> <p>d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F.U. Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1				<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart A: General</b>  <b>Section 722.111: Hazardous Waste Determination</b>  Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
OTH	1				<b>Section 722.112: USEPA Identification Number</b>  a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

GEN-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart B: The Manifest</b>				
				<b>Section 722.120: General Requirements</b>				
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <u>X</u> No <u>    </u>				
				<b>Note:</b> If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <u>X</u> No <u>    </u>				
				<b>Note:</b> The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <u>    </u> No <u>X</u>				

GEN-B-1



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			<b>Section 722.121: Acquisition of Manifests</b>  a Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  b For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?  or  For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
MAN	2			<b>Section 722.122: Number of Copies</b>  Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			<b>Section 722.123: Use of the Manifest</b>  For each manifest received, has the generator:  1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

GEN-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

GEN-B-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart C: Pre-Transport Requirements</b>  <b>Section 722.130: Packaging</b>  Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			X	<i>No waste ready for shipment.</i>
					<b>Section 722.131: Labeling</b>  Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			X	
					<b>Section 722.132: Marking</b>  a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____  b Is each package of hazardous waste which is ready for transportation off-site marked with:  - The generator's name and address? Yes ____ No ____  - The manifest document number associated with the container? Yes ____ No ____  - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____			Y	

GEN-C-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<b>Section 722.133: Placarding</b>  Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> <li>- Placard the transport vehicle, or</li> <li>- Offer to the first transporter, according to 49 CFR, Part 172, Subpart F?</li> </ul> <b>NOTE:</b> If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			X	
OTH	1	X		<b>Section 722.134: Accumulation Time</b>  <b>NOTE:</b> If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.  <b>NOTE:</b> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.  a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below:  <b>NOTE:</b> If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.			X	

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time				<i>Daily TANK Inspection not being conducted on Pyramide Kill time being tracked by Subpart J.</i>
				<p><b>NOTE:</b> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p>				
			a1	<p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p style="text-align: center;">and/or</p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p>Yes ____ No <u>X</u></p>				
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes <u>X</u> No ____ N/A ____</p>				
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <u>X</u> No ____</p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p>Yes <u>X</u> No ____</p>				

GEN-C-2(a)

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center"><b>SATELLITE ACCUMULATION</b></p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <p>- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- Complying with the requirements of:</p> <p>1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-26

Area	Class	90 Day F U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
			c2		<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are the containers with the excess amounts marked with the date accumulation began?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

GEN-C-27

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr		Yes	No		
OTH	2			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart D: Recordkeeping and Reporting</b>  <b>Section 722.140: Recordkeeping</b>  Has the generator retained for a period of three years:				
			a	- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
d		If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>						

GEN-D-1



Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2				<b>Section 722.141: Annual Reporting</b>  Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?  <b>NOTE:</b> A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	X			
MAN	1				<b>Section 722.142: Exception Reporting</b>  a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____  b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____  b Does any exception report submitted to the Director contain the following:  - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			X	

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts?  Yes ____ No ____ N/A <u>X</u></p> <p><b>Section 722.143: Additional Reporting</b></p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				
						X		

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1/2				<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart E: Exports of Hazardous Waste</b>  <b>Section 722.152: General Requirements</b>  Has the facility made any shipments of hazardous waste outside the United States? Yes _____ No <u>  X  </u>  <b>NOTE:</b> If "No", skip Subpart E. If "Yes", answer the next question.  Has the generator complied with the requirements in Sections 722.152 through 722.157? Yes _____ No _____  <b>NOTE:</b> If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.				

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No	
			Sub Sec	Yes		No				
MAN	1				<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart F: Imports of Hazardous Waste</b>  <b>Section 722.160: Imports of Hazardous Waste</b>			X		
					b1	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that:  In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;  and				
					b2	Has the importer or his agent signed the manifest in place of the generator;  and				
					b2	Has the importer or his agent obtained the signature of the initial transporter? Yes ____ No ____ N/A ____				
					c	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ____ No ____				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec	Yes		No			
OTH	2	X			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart G: Farmers</b>  <b>Section 722.170: Farmers</b>  Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: <ul style="list-style-type: none"> <li>- Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ____ No ____ N/A ____</li> <li>- Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ____ No ____ N/A ____</li> </ul> <p><b>NOTE:</b> If the answer to either of the preceeding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>			X	

GEN-G-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<b>PART 723</b> <b>STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE</b> <b>Subpart A: General</b>  <b>Section 723.110: Scope</b>  Has the firm ever transported hazardous waste into the United States from abroad? Yes ____ No <u>X</u>  Has the firm ever mixed hazardous wastes of different DOT shipping descriptions by placing them in a single container? Yes ____ No <u>X</u>  <b>NOTE: A "Yes" answer to either of these questions means the transporter is also a generator of hazardous waste subject to the requirements of Part 722. Complete the generator inspection form.</b>			X	
OTH	1			<b>Section 723.111: USEPA Identification Number</b>  a Has the transporter obtained a USEPA identification number?	X			
OTH	1	X		<b>Section 723.112: Transfer Facility Requirements</b>  Has a transporter of hazardous waste stored manifested shipments of such waste:  - For a period of 10 days or less? Yes ____ No ____			X	<i>Facility is Also a TSD</i>

TR-A-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- Only in containers meeting the requirements of 35 Ill. Adm. Code 722.130, Packaging? Yes _____ No _____</p> <p><u>NOTE:</u> A "No" answer to the above questions means that the transporter is also a storer of hazardous waste subject to the requirements of 35 Ill. Adm. Code 702, 703, and 724 (725). Complete the TSD inspection form.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1/2			<b>PART 723</b> <b>STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE</b> <b>Subpart B: Compliance with the Manifest System and Recordkeeping</b>  <b>Section 723.120: The Manifest System</b>	X			Facility is the Generator, transporter AND TSD of the Waste.
			a	Prior to accepting hazardous waste from a generator, has the transporter received a manifest signed by the generator in accordance with the provisions of Part 722; and in the case of exports, does the manifest have attached to it the cable sent to USEPA from the U.S. Embassy in a receiving country that acknowledges the written consent of the receiving country to accept the hazardous waste and describes the conditions of the receiving country's consent to the shipment? Yes <u>X</u> No <u>    </u>				
			b	Prior to transporting hazardous waste, has the transporter apparently: <ul style="list-style-type: none"> <li>- Signed and dated the accompanying manifests? Yes <u>X</u> No <u>    </u></li> <li>- Returned a signed copy to the generator before leaving the generator's property? Yes <u>X</u> No <u>    </u></li> </ul>				
			c	Does the manifest (including the USEPA acknowledgement of consent) apparently remain with the load of hazardous waste during transport? Yes <u>X</u> No <u>    </u>				
			d	Has the transporter who delivers hazardous waste to another transporter or to the designated facility:				

TR-B-1



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				1) Apparently obtained the date of delivery and the handwritten signature of the transporter or designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				2) Retained one copy of the signed manifest in accordance with Section 723.122? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) Apparently given the remaining copies of the manifest to the accepting transporter or designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Has the transporter followed the procedures prescribed in Section 723.120(e) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			f	Has the transporter followed the procedures prescribed in Section 723.120(f) for manifesting shipments of hazardous waste involving rail transportation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			g	Has the transporter who transports hazardous waste out of the United States:  1) Indicated on the manifest the date the hazardous waste left the United States? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				2) Signed the manifest and retained one copy in accordance with the requirements in Section 723.122(c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TR-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	1			3) Apparently returned a signed copy of the manifest to the generator? Yes ____ No ____				
			4) Apparently given a copy of the manifest to a U.S. Customs official at the point of departure from the United States? Yes ____ No ____					
				<b>Section 723.121: Compliance with the Manifest</b>  Has a transporter received waste from a Reduced Requirements generator? Yes ____ No <u>X</u>	X			
				<b>NOTE:</b> If "No", skip Section 723.121. If "Yes", answer the following questions:  Is the waste being transported pursuant to a reclamation agreement provided for in 35 IAC 722.120(e)? Yes ____ No ____  <b>AND</b>  If "Yes", is the transporter recording on a log or shipping paper:  1) Name, address and USEPA ID number of the generator of the waste;  <b>AND</b>  2) Quantity of waste accepted;  <b>AND</b>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) All shipping information required by U.S.D.O.T;</p> <p>AND</p> <p>4) The date the waste is accepted? Yes ____ No ____</p> <p>AND</p> <p>Does the transporter carry this record when transporting waste to the reclamation facility? Yes ____ No ____</p> <p>AND</p> <p>Does the transporter retain these records for a period of three years after termination or expiration of the agreement? Yes ____ No ____</p> <p>Has the transporter delivered the entire quantity of hazardous waste accepted from the generator or other transporter to:</p> <p>1) The designated facility on the manifest? Yes ____ No ____</p> <p>OR</p> <p>2) The alternate designated facility if the hazardous waste cannot be delivered to the designated facility because an emergency prevented delivery? Yes ____ No ____ N/A ____</p> <p>OR</p>				

TR-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			3) The next designated transporter? Yes ____ No ____ N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
				OR				
				4) The place outside the United States designated by the generator? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				NOTE: A "No" answer can still be in compliance.				
			b	In any case where the transporter could not deliver the hazardous waste to the facility designated on the manifest, did the transporter contact the generator for further directions and then revise the manifest according to the generator's instructions? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				Section 723.122: Recordkeeping				Copies of manifests kept on site
a	Has the transporter kept a copy of each completed, signed manifest for a period of three years from the date the hazardous waste was accepted by the initial transporter? Yes <input checked="" type="checkbox"/> No ____							
b	Has the transporter followed the procedures prescribed in Section 723.122(b) for recordkeeping for bulk shipments of hazardous waste by water? Yes ____ No ____ N/A <input checked="" type="checkbox"/>							
c	Has the transporter followed the procedures prescribed in Section 723.122(c) for shipments of hazardous waste by rail within the United States? Yes ____ No ____ N/A <input checked="" type="checkbox"/>							

TR-B-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			d	Has the transporter who transports hazardous waste out of the United States kept a copy of each manifest indicating that the hazardous waste left the United States for a period of three years from the date the waste was accepted by the initial transporter? Yes ____ No ____ N/A <u>X</u>				
			e	Does a transporter who is involved in any unresolved enforcement action continue to maintain the records required in 723.140(a) thru (d)? Yes ____ No ____ N/A <u>X</u>				
				OR				
			e	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the transporter continued to maintain them? Yes ____ No ____ N/A <u>X</u>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<b>PART 723</b> <b>STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE</b> <b>Subpart C: Hazardous Waste Discharges</b>  <b>Section 723.130: Immediate Action</b>			X	
			a	Did a transporter who has had an incident where hazardous waste was discharged from the transport vehicle, vessel or aircraft take appropriate immediate action to protect human health and the environment (for example, notify local authorities, dike the discharge area)? Yes ____ No ____				
OTH	1	X		c Did the transporter who had discharged hazardous waste give notice and prepare a written report as required in Section 723.130(c) and (d)? Yes ____ No ____			X	
				<b>Section 723.131: Discharge Clean-Up</b>  After a discharge of hazardous waste did the transporter: <ul style="list-style-type: none"> <li>- Clean-up the discharge? Yes ____ No ____</li> <li>- Take such action as may be required or approved by Federal, State or local officials so that the hazardous waste no longer presents a hazard to human health or the environment? Yes ____ No ____</li> </ul>				

TR-C-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart A: General Provisions</b>  <b>Section 725.101: Purpose, Scope and Applicability</b>  Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  <b>NOTE: If "Yes", explain in narrative.</b>  d Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes <input type="checkbox"/> No <input type="checkbox"/> <i>n/a</i> <input checked="" type="checkbox"/>				

TSD-A-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OIH	1			<b>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards</b>	<input checked="" type="checkbox"/>			
				<b>Section 725.111: USEPA Identification Number</b>				
OTH	1			Has the facility obtained a USEPA identification number?				
				<b>Section 725.112: Required Notices</b>				
OTH	1			a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ____ No ____ N/A <input checked="" type="checkbox"/>				
OTH	1			<b>Section 725.113: General Waste Analysis</b>	<input checked="" type="checkbox"/>			
				a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No ____				

*Contained in  
Part B*



Area	Class	90 Day F-U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				Contained in Part B
			a3	Has the analysis been repeated:  A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>  B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  <b>NOTE:</b> If "No", skip to 725.114.  Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)?  Yes <u>X</u> No <u>    </u></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters?  Yes <u>X</u> No <u>    </u></p> <p>2) The test methods which will be used to test for those parameters?  Yes <u>X</u> No <u>    </u></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed?  Yes <u>X</u> No <u>    </u></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?  Yes <u>X</u> No <u>    </u></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply?  Yes <u>X</u> No <u>    </u></p>				<p>- ONCE per year</p> <p>- see waste deposition form</p> <p>- no off site waste</p> <p>Accepted.</p>

TSD-B-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.293 (Tanks);</li> <li>- 725.325 (Surface Impoundments);</li> <li>- 725.352 (Waste Piles);</li> <li>- 725.373 (Land Treatment);</li> <li>- 725.414 (Incinerators);</li> <li>- 725.475 (Thermal Treatment);</li> <li>- 725.502 (Chem. Phys. Bio. Treat.)</li> </ul> <p>Yes _____ No <u>X</u> N/A _____</p> <p><b>NOTE:</b> Circle the specific waste management methods being employed.</p>				
			c	<p>For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <u>X</u> No _____ N/A _____</p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <u>X</u> No _____ N/A _____</p> <p><b>Section 725.114: Security</b></p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes _____ No <u>X</u></p>	<u>X</u>			

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			b	<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<b>Section 725.115: General Inspection Requirements</b>	<input checked="" type="checkbox"/>			
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b4	Does the schedule specify at least the following minimum inspection frequency:				
				- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> <li>- 725.274 (Containers);</li> <li>- 725.294 (Tanks);</li> <li>- 725.326 (Surface Impoundments);</li> <li>- 725.447 (Incinerators);</li> <li>- 725.477 (Thermal Treatment);</li> <li>- 725.503 (Chem. Phys. Bio. Treat.)</li> </ul> <p>Yes _____ No _____ N/A _____</p> <p><b>NOTE: Circle the applicable section.</b></p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No _____</p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input checked="" type="checkbox"/> No _____</p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> <li>- The date and time of the inspection? Yes <input checked="" type="checkbox"/> No _____</li> <li>- The name of the inspector? Yes <input checked="" type="checkbox"/> No _____</li> </ul>				

TSD-B-7

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr	Sub Sec		Yes	No		
OTH	2				<ul style="list-style-type: none"> <li>- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> <li>- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>				
					<p><b>Section 725.116: Personnel Training</b></p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

Kept at each site



Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _ _ No <u>X</u>				no descriptions for site 1-9.
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <u>X</u> No _				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <u>X</u> No _				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <u>X</u> No _ N/A _	X			
				<b>Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes</b>				
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <u>X</u> No _				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <u>X</u> No _				

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	<p>Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			b	<p>Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:</p> <ol style="list-style-type: none"> <li>1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> <li>2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> <li>3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> <li>4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> <li>5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> </ol>				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p><b>Section 725.118: Location Standards</b></p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> A "Yes" answer is a violation of the location standard.</p>				

TSD-B-12

Area	Class	90 Day F.U. Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart C: Preparedness and Prevention</b>  <b>Section 725.131: Maintenance and Operation of Facility</b>  Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> <li>- Air;</li> <li>- Soil; or</li> <li>- Surface water,</li> </ul> which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
OTH	1	X		<b>Section 725.132: Required Equipment</b>  Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> <li>a - An internal communications or alarm system capable of providing immediate emergency instructions?                Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams?                Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	<input checked="" type="checkbox"/>			

TSD-C-1

Area	Class	90 Day F-U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	<ul style="list-style-type: none"> <li>- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	<input checked="" type="checkbox"/>			
			d	<ul style="list-style-type: none"> <li>- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p><u>NOTE:</u> Any "N/A" answers must be explained in the Remarks column.</p> <p><b>Section 725.133: Testing and Maintenance of Equipment</b></p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> <li>- Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p><u>NOTE:</u> Any "N/A" answer must be explained in the Comments.</p>				

TSD-C-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<b>Section 725.134: Access to Communications or Alarm Systems</b>  a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1	X		<b>Section 725.135: Required Aisle Space</b>  Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			<b>Section 725.137: Arrangements with Local Authorities</b>  a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE: Any "N/A" answer must be explained in the Comments.</b></p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Olin also has a Full-time Fire Dept, but has a mutual aid Agreement with Local Fire Departments</p>

TSD-C-4

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart D: Contingency Plan and Emergency Procedures</b>  <b>Section 725.151: Purpose and Implementation of Con-</b> <b>tingency Plan</b>	X			
			a Is a plan available? Yes <u>X</u> No <u>    </u>  <b>NOTE: If the answer is "No", skip to 725.155.</b>  a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <u>X</u> No <u>    </u>  b Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <u>X</u> No <u>    </u> N/A <u>    </u>					
OTH	2			<b>Section 725.152: Content of Contingency Plan</b>  a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:  1) Fires? Yes <u>X</u> No <u>    </u> 2) Explosions? Yes <u>X</u> No <u>    </u>	X			

TSD-D-1



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <u>X</u> No <u>    </u></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <u>X</u> No <u>    </u></p> <p>2) Hospitals? Yes <u>X</u> No <u>    </u></p> <p>3) Contractors? Yes <u>X</u> No <u>    </u></p> <p>4) State and local emergency response teams? Yes <u>X</u> No <u>    </u></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <u>X</u> No <u>    </u></p> <p>d Is the list of emergency coordinators up-to-date? Yes <u>X</u> No <u>    </u></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <u>X</u> No <u>    </u></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <u>X</u> No <u>    </u></p>				

TSD-D-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.		
			Sub Sec		Yes	No				
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				<i>→ maintained at each site</i>		
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>						
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			Section 725.153: Copies of Contingency Plan							
			a	Has a copy (and all revisions) of the contingency plan:						
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						
			b	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>						

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<b>725.154: <del>Amendment</del> of Contingency Plan</b>	<input checked="" type="checkbox"/>			
				Has the contingency plan been reviewed and, if necessary, amended whenever:				
			a	1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
OTH	2			<b>Section 725.155: Emergency Coordinator</b>	<input checked="" type="checkbox"/>			
				Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-D-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>Section 725.156: Emergency Procedures</b></p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			<p>Releases have been reported, responded to and then written reports submitted as required.</p> <p>not since last inspection.</p>

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart E: Manifest System, Recordkeeping and Reporting</b>  <b>Section 725.171: Use of Manifest System</b>  Does the facility accept waste from off-site? Yes ____ No <u>X</u>  <b>NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.</b>  For each manifest reviewed, did the facility:				<i>also use manifest to ship waste within their own site because they have to travel public roads.</i>
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ____ No ____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ____ No ____ N/A ____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes ____ No ____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ____ No ____				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ____ No ____				

TSD-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes ____ No ____ N/A ____</p> <p>Does the facility initiate shipments of hazardous waste? Yes ____ No ____</p> <p><b>NOTE:</b> If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p><b>Section 725.172: Manifest Discrepancies</b></p> <p><b>NOTE:</b> If there are no manifest discrepancies, mark the "N/A" column.</p>			X	
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ____ No ____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ____ No ____</p>				

TSD-E-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<b>Section 725.173: Operating Record</b>				
			a	Does the owner or operator have a written operating record at the facility? Yes <u>X</u> No <u>    </u>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <u>X</u> No <u>    </u>				
			b	Does the operating record contain the following information:  1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <u>X</u> No <u>    </u>  2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <u>X</u> No <u>    </u>  3) The location of each hazardous waste within the facility? Yes <u>X</u> No <u>    </u>  4) The quantity of each hazardous waste at each location within the facility? Yes <u>X</u> No <u>    </u>  5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <u>    </u> No <u>    </u> N/A <u>X</u>				

TSD-E-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.113 (Gen. Waste Analysis)? Yes <u>X</u> No <u>    </u></li> <li>- 725.293 (Tanks)? Yes <u>X</u> No <u>    </u> N/A <u>    </u></li> <li>- 725.325 (Surface Improvements)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.352 (Waste Piles)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.373 (Land Treatment)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.441 (Incinerators)? Yes <u>X</u> No <u>    </u> N/A <u>    </u></li> <li>- 725.475 (Thermal Treatment)? Yes <u>X</u> No <u>    </u> N/A <u>    </u></li> <li>- 725.502 (Chem., Phys., Bio. Treatment)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> </ul> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <u>X</u> No <u>    </u> N/A <u>    </u></p>				

TSD-E-4



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> <li>- 725.190 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>not inspected</i></li> <li>- 725.194 (G.W. Monitoring)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>during LE</i></li> <li>- 725.376 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- 725.378 (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- 735.380(d)(1) (Land Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- 725.447 (Incinerators)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- 725.477 (Thermal Treatment)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> </ul> <p><b>NOTE:</b> Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
				<b>Section 725.174: Availability, Retention and Disposition of Records</b>	<input checked="" type="checkbox"/>			
			a	During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: <ul style="list-style-type: none"> <li>- The Agency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></li> <li>- The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> </ul>				
			b	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

TSD-E-6

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<b>Section 725.175: Annual Report</b>  Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
OTH	1			<b>Section 725.176: Unmanifested Waste Report</b>  Does the facility accept hazardous waste from off-site? Yes _____ No <input checked="" type="checkbox"/> <p><b>NOTE:</b> If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.</p> Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes _____ No _____ <p>Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105?            Yes _____ No _____</p> <p><b>NOTE:</b> If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:</p> Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes _____ No _____	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

TSD-E-7

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste?  Yes. ____ No ____</p> <p><b>Section 725.177: Additional Reports</b></p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>	X			
			a	<p>1) Releases, fires, explosions as specified in Section 725.156?  Yes <u>X</u> No ____ N/A ____</p>				
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194?  Yes ____ No ____ N/A ____ <i>not inspected</i></p>				
c	<p>3) Facility closure as specified in Section 725.215?  Yes <u>X</u> No ____ N/A ____</p>							

TSD-E-8

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
CLO	1			a	<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b> <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subparts G and H: Closure, Post-Closure and Financial</b> <b>Requirements</b>				<i>Surface impoundment gone through extended closure</i>
					<b>Section 725.212: Closure Plan</b>				
					Was the most current facility closure plan available during the inspection? Yes <u>X</u> No <u>    </u>				<i>Also</i> <i>Site</i>
					Was the closure plan submitted to the Agency within the time frames specified below:				<i>Process Code</i> <i>TC1</i>
					- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <u>X</u> No <u>    </u> N/A <u>    </u>				<i>TC4</i>
					- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <u>    </u> No <u>    </u> N/A <u>X</u>				<i>SO1</i>
					- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <u>X</u> No <u>    </u> N/A <u>    </u>				<i>TC3</i>
					- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <u>    </u> No <u>    </u> N/A <u>    </u>				<i>SO1</i>
									<i>SO1</i>

TSD-G/H-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		a	<ul style="list-style-type: none"> <li>No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ul>				
				<b>Section 725.218: Post-Closure Plan</b>  Was the most current facility post-closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No _____				
				Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
FIN	1			<b>Section 725.242: Cost Estimate for Closure</b>  Has the facility prepared a written estimate of the cost of closing the facility?	<input checked="" type="checkbox"/>			
FIN	1			<b>Section 725.244: Cost Estimate for Post-Closure Care</b>  Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?  <b>NOTE:</b> If no post-closure plan, mark "N/A".	<input checked="" type="checkbox"/>			

TSD-G/H-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart I: Use and Management of Container</b>  <b>Section 725.271: Condition of Containers</b>  Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?	X			
OTH	1	X			<b>Section 725.272: Compatibility of Waste with Containers</b>  Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired?	X			
OTH	1	X			<b>Section 725.273: Management of Containers</b>  a Are containers of hazardous waste always closed during storage? Yes <u>X</u> No <u>    </u>  b Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>X</u> No <u>    </u>				
OTH	2				<b>Section 725.274: Inspections</b>  Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <u>X</u> No <u>    </u>				

TSD-I-1

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p> <p>Section 725.276: Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?</p>				
				<p>Section 725.277: Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>	X			

TSD-I-2



Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<p><b>PART 725</b>  <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b>  <b>Subpart J: Tank Systems</b></p> <p><b>Section 725.290: Applicability</b></p> <p>Does the facility store or treat hazardous waste in tanks?            Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If "No", skip Subpart J.</p> <p><b>NOTE:</b> Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements.</p> <p>Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor?            Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> Failing the filter test means that the waste contains free liquids.</p>				<p>Tank has II<sup>o</sup>            Cont.</p>
			a	<p><b>Section 725.291: Assessment of Existing Tank Systems</b></p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available?            Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p>				

TSD-J-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> <li>1) available standards for the tank and ancillary equipment;</li> <li>2) hazardous characteristics of the wastes;</li> <li>3) existing corrosion protection measures;</li> <li>4) age of the tank system; and</li> <li>5) results of a leak test, internal inspection, or other tank integrity examination? Yes ____ No ____</li> </ol> <p><b>Section 725.292: Design and Installation of New Tank Systems or Components</b></p>			X	
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes ____ No ____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1) design standards for tanks and ancillary equipment;</li> </ol> <p><b>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</b></p> <ol style="list-style-type: none"> <li>2) hazardous characteristics of the waste; and</li> <li>3) evaluation of potential for corrosion and corrosion protection measures? Yes ____ No ____</li> </ol>				

TSD-J-2

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				
				<b>Section 725.293: Containment and Detection of Releases</b>				
			a1	Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A <u>X</u>				
			a2	Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A <u>X</u>				
			a3	For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes <u>X</u> No _____ N/A _____				
			a4	For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No _____ N/A _____  <u>or</u> If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No _____ N/A <u>X</u>				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE:</b> To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				<p>Located over Containment which drains to sump which is part of the Facilities NPDES WWT system.</p>
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?</li> </ol> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE:</b> Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				

TSD-J-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p>1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;</p> <p>2) welded flanges, joints and connections that are inspected daily;</p> <p>3) sealless or magnetic coupling pumps that are inspected daily; and</p> <p>4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>i Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-J-5

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1	X		<b>Section 725.294: General Operating Requirements</b>  b1&2 Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes <u>  X  </u> No <u>      </u>  b3 Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <u>      </u> No <u>      </u> N/A <u>  X  </u>  c If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes <u>      </u> No <u>      </u> N/A <u>  X  </u>	<u>  X  </u>			
OTH	2			<b>Section 725.295: Inspections</b>  c Is the facility operator inspecting and documenting, in an operating record, the results of tank inspection as required in 725.295, Subsections (a) and (b)? Yes <u>      </u> No <u>  X  </u>		<u>  X  </u>		<i>Daily inspections of the cyanide kill tank ARE not being conducted.</i>
OTH	1	X		<b>Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems</b>  Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes <u>      </u> No <u>  X  </u>  NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).			<u>  X  </u>	

TSD-J-6

Area	Class	No Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes ____ No ____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes ____ No ____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes ____ No ____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes ____ No ____</p> <p><u>NOTE: Reporting to the Agency is not necessary if less than one pound of material which was immediately contained and cleaned up was spilled.</u></p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes ____ No ____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes ____ No ____ N/A ____</p> <p><u>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</u></p>				

TSD-J-7

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		f	<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?  Yes ____ No ____ N/A ____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?  Yes ____ No ____ N/A ____</p> <p><b>Section 725.297: Closure and Post Closure Care</b></p> <p><b>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</b></p>				
			a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?  Yes ____ No ____</p> <p>a Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes ____ No ____</p> <p>b If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?  Yes ____ No ____</p> <p><b>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</b></p>			X	

TSD-J-8



Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p><b>Section 725.298: Special Requirements for Ignitable or Reactive Wastes</b></p> <p>Are ignitable or reactive wastes stored in tanks? Yes ____ No ____</p> <p><b>NOTE:</b> If "No", skip to Section 725.299.</p> <p>a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____</p> <p><b>NOTE:</b> Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes.</p> <p>b Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____</p>			✓	
OTH	1			<p><b>Section 725.299: Special Requirements for Incompatible Wastes</b></p> <p>Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A ____</p>			X	

TSD-J-9

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance <sup>1</sup>		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p><b>Section 725.300: Waste Analysis and Trial Tests</b></p> <p>In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:</p> <p>a      1) Conducted a waste analysis and trial treatment or storage tests? Yes ____ No ____ N/A ____</p> <p>or</p> <p>b      2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes ____ No ____ N/A ____</p> <p><b>NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.</b></p>	X			<p>Stores in specific waste stream</p>

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart K: Surface Impoundments</b>  <b>Section 725.321: Design Requirements</b>			X	<i>Extended delayed closure being pursued for the unit to allow continued use for nonhazardous wastewater while ground water monitoring occurs. Since the surface impoundment is not being used for hazardous waste this section is not being completed. The facility is maintaining daily inspections to ensure sufficient freeboard maintained</i>
			a	Has the owner or operator met the requirements for liners and leachate collection systems in accordance with 35 Ill. Adm. Code 724.321(c) for each new unit, or lateral expansion of an existing unit, that is within the area identified in the facility Part A permit application? Yes ____ No ____ N/A ____				
				<b>NOTE: If "N/A" is checked, provide a detailed explanation of why the site is not subject to the requirements, or why the requirements have been waived by the Agency pursuant to 725.321(c) or (d) and skip to 725.322.</b>				
			a	Did the owner or operator meet the above requirement for waste received after May 8, 1985? Yes ____ No ____				
OTH	1	X		b Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes ____ No ____				
			b	Did the owner or operator submit a Part B permit application within six months of the Agency's receipt of notification? Yes ____ No ____				
				<b>Section 725.322: General Operating Requirements</b>				
			b	Does the owner or operator make the claim that a free board of less than two feet may be maintained in the surface impoundment? Yes ____ No ____				

TSD-K-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1	X			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart L: Waste Piles</b>  <b>Section 725.351: Protection from Wind</b>  Is the waste pile subject to dispersal by the wind? Yes ____ No ____  <b>NOTE:</b> If the answer is "Yes", complete the rest of this section. If "No", then check "N/A" and describe why the pile is not subject to wind dispersal in the Remarks.  Is the owner or operator:  1) Covering the pile to control dispersal? Yes ____ No ____ N/A ____  OR  2) Managing the pile by some other means to control dispersal? Yes ____ No ____ N/A ____  <b>NOTE:</b> If the answer to 2 is "Yes", explain in detail the "other means" being used to control dispersal.			X	No waste piles on the site.  The waste piles at the site ~ 1981-82 are currently going through closure.  Since no waste pile are currently on site the section was not completed
OTH	1			a1	<b>Section 725.352: Waste Analysis</b>  Are the only wastes the facility receives which are amenable to piling compatible with each other? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
OTH	1			<p><b>PART 725</b>  <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF</b>  <b>HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b>  <b>Subpart 0: Incinerators</b></p> <p><b>Section 725.440: Applicability</b></p> <p>b If the owner or operator claims to be exempt from the requirements of this subpart, except for Section 725.451 (closure), has he documented in writing (and has he retained at the facility this documentation) that the waste to be burned is identified in 725.440(b) and that it would not reasonably be expected to contain any of the hazardous constituents listed in 35 Ill. Adm. Code 721, Appendix H?  Yes _____ No <u>X</u></p> <p><b>NOTE:</b> If the answer is "No", the facility is regulated under this Subpart.</p> <p><b>Section 725.441: Waste Analysis</b></p> <p>Has the owner or operator obtained analyses of wastes prior to the first time they are burned in the incinerator to enable him to establish steady state operating conditions and to determine the types of pollutants which might be emitted?  Yes <u>X</u> No _____</p> <p>Does the waste analysis include at least:</p> <p>a 1) Heating value of the waste?  Yes <u>X</u> No _____</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	b	2) Halogen and sulfur content of the waste? Yes ____ No ____ <u>N/A</u> <u>X</u>				
			c	3) Lead and mercury content of the waste? Yes <u>X</u> No ____ N/A ____				
			c	4) Written documented data to show that the waste does not contain lead or mercury? Yes ____ No ____ N/A <u>X</u>				
OTH	1		<b>Section 725.445: General Operating Requirements</b>  Are wastes fed to the incinerator only when it is at steady state (normal) conditions of operation, including temperature and air flow?	<u>X</u>				
			<b>Section 725.447: Monitoring and Inspections</b>  Is the owner or operator conducting the following moni- toring and inspections when incinerating hazardous waste:					
		a	1) Existing instruments which relate to combustion and emission control every 15 minutes? Yes <u>X</u> No ____					
	b	2) The complete incinerator and associated equip- ment for leaks, spills, and fugitive emissions once a day? Yes <u>X</u> No ____						
	b	3) All emergency shutdown controls and systems alarms to assure proper operations at least once a day? Yes <u>X</u> No ____						

TSD-O-2

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<p><b>Section 725.451: Closure</b></p> <p><b>NOTE:</b> Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p> <p>Have all hazardous wastes and hazardous waste residues (including, but not limited to, ash, scrubber waters and scrubber sludges) been removed from the incinerator at the completion of closure?</p>			X	
OTH	1			<p><b>Section 725.452: Interim Status Incinerators Burning Particular Hazardous Wastes</b></p> <p>a Prior to burning hazardous waste numbers F020, F021, F022, F023, F026 or F027, has the owner or operator received a certification from the Agency that they meet the performance standards of 35 Ill. Adm. Code 724, Subpart 0, and have followed the procedures in 725.452(b)(1)?</p>			X	

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1	X			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart Q: Chemical, Physical and Biological Treatment</b>  <b>Section 725.500: Applicability</b>  Is the chemical, physical or biological treatment being done in other than:  1) Tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  2) Surface impoundments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  3) Land treatment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  <b>NOTE:</b> If the answer to all of the above is "Yes", complete this Section. Chemical, physical and biological treatment of hazardous waste in tanks, surface impoundments and land treatment facilities is regulated under 35 Ill. Adm. Code 725 (724), Subparts J, K, and M, respectively.  <b>Section 725.501: General Operating Requirements</b>	X			Hammermill are used to treat premises. Olin submitted a Part A withdrawal request as they claim the material is non-hazardous. However they are maintaining all 725 requirements until request is approved by the agency.
					a Is the chemical, physical or biological treatment of hazardous waste in compliance with Section 725.117(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  b Are only hazardous waste treatment reagents being placed in the treatment process or equipment which will not cause the treatment process or equipment to rupture, leak, corrode, or otherwise fail before the end of its intended life? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-Q-1



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1		c	<p>Where hazardous waste is continuously fed into a treatment process or equipment, is the process or equipment equipped with a means to stop this inflow?  Yes ____ No ____ N/A <u>X</u></p> <p><b>Section 725.502: Waste Analysis and Trial Tests</b></p> <p>Prior to using the treatment process or equipment to chemically, physically or biologically treat a hazardous waste, which is substantially different from waste previously treated in a treatment process or equipment; or a substantially different process from any previously used at the facility is used to chemically treat hazardous waste, has the owner or operator:</p> <p>b1 1) Conducted waste analyses or trial tests?  Yes ____ No ____ N/A ____</p> <p style="text-align: center;">OR</p> <p>b2 2) Obtained written documented information on similar treatment of similar waste under similar operating conditions?  Yes ____ No ____ N/A ____</p> <p><b>Section 725.503: Inspections</b></p> <p>a Is the owner or operator inspecting, where present:</p> <p>1) Discharge control equipment and safety equipment at least once each operating day to ensure it is in good working order?  Yes ____ No ____ N/A ____</p>				<p>Scrap primer is the only waste produced</p>
OTH	1/2							

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1		b	2) Data gathered from monitoring equipment at least once each operating day to ensure that the treatment process or equipment is being operated according to its design? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c	3) The construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	4) The construction materials of, and the area immediately surrounding, discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			<p><b>NOTE:</b> Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspection, the date of the last inspection, etc., to determine if inspections are actually being done.</p> <p><b>Section 725.504: Closure</b></p> <p><b>NOTE:</b> Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p> <p>Have all hazardous wastes and hazardous waste residues been removed from treatment processes or equipment, discharge control equipment and discharge confinement structures at the completion of closure?</p>					

TSD-Q-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			<p><b>Section 725.505: Special Requirements for Ignitable or Reactive Wastes</b></p> <p>a Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in the treatment process or equipment so that:</p> <p>1) The resulting waste, mixture and dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>AND</p> <p>2) Section 725.117(b) is complied with? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>OR</p> <p>b Is the waste treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			<i>primer waste is detonated in the hammermill</i>
OTH	1			<p><b>Section 725.506: Special Requirements for Incompatible Wastes</b></p> <p>Is the owner or operator complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?</p>			<input checked="" type="checkbox"/>	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p><b>PART 728</b>  <b>LAND DISPOSAL RESTRICTIONS</b></p> <p><b>Section 722.111(d) - Waste Identification (Information Only)</b></p> <p>1. Does the facility handle the following wastes?</p> <p>a. F001 through F005 spent solvents  Yes <u>X</u> No <u>    </u> List* <u>F001, F002, F003</u></p> <p>b. Dioxin-containing wastes  Yes <u>    </u> No <u>X</u> List* <u>                    </u></p> <p>c. California List wastes  Yes <u>    </u> No <u>    </u> List* <u>                    </u></p> <p>d. First, Second and Third Third wastes  <u>      D001, D009, D008      </u>  Yes <u>X</u> No <u>    </u> List* <u>K046, F006 F009</u></p> <p>*List waste if room allows or attach Appendix A.</p> <p>2. Does the facility handle the following wastes (National Capacity Variances)?</p> <p>a. F001-F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date - 11/8/90).  Yes <u>    </u> No <u>X</u></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>c. California List contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date - 11/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052 or K071 (effective date - 8/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103 and K104 (effective date - 8/8/90).</p> <p>Yes ____ No <u>X</u></p> <p>f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 6/8/91)</p> <p>Yes ____ No <u>X</u></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.															
				YES	NO																	
			<p><b>Section 728.107 - Waste Analysis Treatability Group - Treatment Standards Identification)</b></p> <p>F-solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p>If yes, check the appropriate treatability group.</p> <p><u>    </u> Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight).</p> <p><u>X</u> All other spent solvent wastes.</p> <p>First, Second and Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?</p> <p>Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p>If yes, list the waste code and check the correct treatability group.</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Wastewater*</u></th> <th><u>Non-Wastewater</u></th> </tr> </thead> <tbody> <tr> <td><u>F006-09</u></td> <td><u>X</u></td> <td><u>X</u></td> </tr> <tr> <td><u>K046</u></td> <td><u>X</u></td> <td><u>X</u></td> </tr> <tr> <td><u>0001, 0008</u></td> <td><u>    </u></td> <td><u>X</u></td> </tr> <tr> <td><u>0007</u></td> <td><u>    </u></td> <td><u>    </u></td> </tr> </tbody> </table> <p>* less than 1% TOC by weight and less than 1% filterable solids.</p>	<u>Waste Code</u>	<u>Wastewater*</u>	<u>Non-Wastewater</u>	<u>F006-09</u>	<u>X</u>	<u>X</u>	<u>K046</u>	<u>X</u>	<u>X</u>	<u>0001, 0008</u>	<u>    </u>	<u>X</u>	<u>0007</u>	<u>    </u>	<u>    </u>				
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<u>0007</u>	<u>    </u>	<u>    </u>																				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p><b>Section 728.142: Treatment Standards Expressed as Specified Technologies</b></p> <p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers or incineration?</p> <p>Yes ____ No ____ N/A <u>X</u></p> <p>If yes, specify the method: _____</p> <p>1) For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods?</p> <p>Yes ____ No ____ N/A <u>X</u></p> <p>2) For hazardous waste that contains HOCs in total concentrations greater than or equal to 1000 mg/l or 1000 mg/kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of Part 724, Subpart 0 or Part 725, Subpart)?</p> <p>Yes ____ No ____ N/A <u>X</u></p> <p>3) Are the following non-wastewater forms of the following hazardous wastes incinerated in accordance with the requirements of 35 Ill. Adm. Code 724, Subpart 0 or 35 Ill. Adm. Code, Subpart 0 or burned in boilers or industrial furnaces as defined in 35 Ill. Adm. Code 720 in accordance with 35 Ill. Adm. Code 726: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes ____ No ____ N/A <u>X</u></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>4) Are the following wastewater forms of the following hazardous wastes treated by carbon adsorption, incineration or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, U058, U087, U221, U223?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>If an alternative method is used, specify the method and state whether the facility has received approval from the Agency for an exemption from the incineration requirement:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><b>Section 728.141 - Treatment Standards Expressed as Concentrations in <u>Waste Extract</u></b></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes <u>X</u> No _____</p> <p>If yes, did the generator select the most stringent treatment standards (728.141(b))?</p> <p>Yes <u>X</u> No _____</p> <p><b>Section 728.143 - Treatment Standards Expressed as Concentrations in <u>Waste</u></b></p> <p>Does the generator mix restricted wastes with different treatment standards?</p> <p>Yes <u>X</u> No _____</p>				



Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, did the generator select the most stringent treatment standards (728.143(b))?</p> <p>Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p><b>Section 728.107 - Waste Analysis</b></p> <p>Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:</p> <p>1) Knowledge of Waste Yes <u>X</u> No <u>    </u></p> <p>List the waste for which "applied knowledge" was used and describe the basis of the applied knowledge determination.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Was all supporting data retained on-site?</p> <p>Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p>2) Total Constituent Analysis? Yes <u>    </u> No <u>X</u> N/A <u>    </u></p> <p>List the waste for which total constituent analysis was used and provide the date of the last test, the frequency of testing and note any problems.</p> <p>_____</p> <p>_____</p> <p>_____</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>3) TCLP? Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p>List the wastes for which TCLP was used and provide the date of last test, the frequency of testing and note any problems.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><b>Section 728.132 - Waste Specific Prohibitions - California List Wastes</b></p> <p>Are the following hazardous wastes being land disposed:</p> <p>1) Liquid (*) hazardous wastes having a pH less than or equal to 2.0?</p> <p>Yes <u>    </u> No <u>    </u> <u>n/A</u> <u>X</u></p> <p>2) Liquid (*) hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm?</p> <p>Yes <u>    </u> No <u>    </u> <u>n/A</u> <u>X</u></p> <p>3) Liquid (*) hazardous wastes that are primarily water and contain HOCs in total concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l?</p> <p>Yes <u>    </u> No <u>    </u> <u>n/A</u> <u>X</u></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p><b>NOTE: The following hazardous wastes are prohibited from land disposal unless they are disposed of in a landfill or surface impoundment which has been granted a case-by-case extension pursuant to Section 728.105:</b></p> <ol style="list-style-type: none"> <li>1) Liquid hazardous wastes that contain HOC's in total concentration greater than or equal to 1000 mg/l and are not prohibited under Subsection a) 3); and</li> <li>2) Non-liquid hazardous wastes containing HOC's in total concentrations greater than or equal to 1000 mg/kg and which are not wastes described in Subsection 728.132(d).</li> </ol> <p><b>NOTE: The requirements of Subsections (a), (d) and (e) do not apply if:</b></p> <ol style="list-style-type: none"> <li>1) an adjusted standard has been granted by the Agency pursuant to a No-Migration Petition under Section 728.106; or</li> <li>2) a case-by-case extension has been granted by the Agency pursuant to Section 728.105; or</li> <li>3) the waste meets applicable treatment standards or where treatment standards are not specified, the waste is subject to a statutory prohibition.</li> </ol> <p>* Did the operator use the Paint Filter Liquids Test Method 9095 (pursuant to Section 720.111) to determine if the waste is a liquid?</p> <p><b>(NOTE: Wastes subject to a Nationwide Capacity Variance are not subject to this Section).</b></p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Is restricted waste treated or stored greater than the time limits specified in Section 722.134?</p> <p>Yes ____ No ____</p> <p>If yes, the TSD checklist must be completed.</p> <p><b>Section 728.107 - Waste Analysis</b></p> <p>i) A. Does the generator ship any waste that <u>exceeds</u> the treatment standards to an off-site <del>disposal</del> <i>treatment</i> facility?</p> <p>Yes <u>X</u> No ____ (If no, go to B)</p> <p>Does the generator ship any waste that <u>exceeds</u> the treatment standards to an off-site disposal facility? (NOTE: If yes, this is a violation of the LDR restrictions.)</p> <p>Yes ____ No <u>X</u></p> <p>If yes, identify the waste code and off-site treatment, storage or disposal facilities:</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Facilities</u></th> <th><u>Treat/Store/Dispose</u></th> </tr> </thead> <tbody> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>Does the generator provide notification to the treatment or storage facility?</p> <p>Yes <u>X</u> No ____</p>	<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store/Dispose</u>	_____	_____	_____	_____	_____	_____	_____	_____	_____				
<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store/Dispose</u>																	
_____	_____	_____																	
_____	_____	_____																	
_____	_____	_____																	

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p>Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s) Yes <u>X</u> No <u>    </u></p> <p>Applicable treatment standards and prohibition levels Yes <u>X</u> No <u>    </u></p> <p>Manifest Number Yes <u>X</u> No <u>    </u></p> <p>Waste Analysis Date (if available) Yes <u>    </u> No <u>X</u></p> <p>2) B. Does the facility ship any waste that <u>meets</u> the treatment standards to an off-site disposal facility? <u>728.109</u></p> <p>Yes <u>X</u> No <u>    </u> (If no, go to C).</p> <p>If yes, identify the waste code and off-site disposal facilities:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Facility</u></td> </tr> <tr> <td><u>N/A</u></td> <td><u>Non-Haz Litchfield -</u></td> </tr> <tr> <td><u>    </u></td> <td><u>Hillsboro - Landfill</u></td> </tr> <tr> <td><u>    </u></td> <td><u>    </u></td> </tr> </table> <p>Does the facility provide notification and certification to the disposal facility?</p> <p>Yes <u>X</u> No <u>    </u></p>	<u>Waste Code</u>	<u>Facility</u>	<u>N/A</u>	<u>Non-Haz Litchfield -</u>	<u>    </u>	<u>Hillsboro - Landfill</u>	<u>    </u>	<u>    </u>				<p>- Generator is treating D008 - D006 Incinerator Ash pursuant to 728.109. Treating in a tank with super triple phosphate to bind D008 - D006.</p>
<u>Waste Code</u>	<u>Facility</u>														
<u>N/A</u>	<u>Non-Haz Litchfield -</u>														
<u>    </u>	<u>Hillsboro - Landfill</u>														
<u>    </u>	<u>    </u>														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the notification contain the following:</p> <p>EPA Hazardous Waste Number(s)    Yes <u>  X  </u>    No <u>      </u></p> <p>Applicable treatment standards and prohibition levels    Yes <u>      </u>    No <u>  N/A  </u> <u>  X  </u></p> <p>Manifest Number    Yes <u>  X  </u>    No <u>      </u></p> <p>Waste Analysis Data (if available)    Yes <u>  X  </u>    No <u>      </u></p> <p>Certification that the waste meets treatment standards (wording in 728.107(a)(2)(ii))    Yes <u>  X  </u>    No <u>      </u></p> <p>3) C. Is the waste subject to a nationwide variance, case-by-case extension (728.105) or no migration petition (728.106)?</p> <p>Yes <u>      </u>    No <u>  X  </u> (If no, go to D)</p> <p>If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal?</p> <p>Yes <u>      </u>    No <u>      </u></p> <p>Does the notification contain the following information?</p> <p>EPA Hazardous Waste Number    Yes <u>      </u>    No <u>      </u></p> <p>The corresponding treatment standards and all applicable prohibitions    Yes <u>      </u>    No <u>      </u></p>				- below TCLP

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			Manifest Number                      Yes _____ No _____ Waste analysis data                      Yes _____ No _____ (if available) Date the waste is subject to the prohibitions                      Yes _____ No _____ 4) D) Does the facility generate any First, Second or Third Third "soft hammer" waste? Yes _____ No <u>X</u> (If No, go to next section) Does the generator provide the following notifi- cation to the receiving facility with each shipment of waste? EPA Hazardous Waste Number                      Yes _____ No _____ Applicable prohibition                      Yes _____ No _____ (728.133(f), 728.134(h)) Manifest Number                      Yes _____ No _____ Waste Analysis Data                      Yes _____ No _____ (if available) Section 728.130 - Waste Specific Prohibitions - Solvent Wastes Section 728.131 - Waste Specific Prohibitions - Dioxin Containing Wastes Section 728.132 - Waste Specific Prohibitions - California List Wastes				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.												
				YES	NO														
			<p>Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?</p> <p>Yes ____ No ____</p> <p>Did the unit meet the Minimum Technology Requirements (MTR) (i.e., double liner, leachate, collection system, groundwater monitoring)?</p> <p>Yes ____ No ____</p> <p><b>Treatment Using RCRA 264/265 Exempt Units or Processes</b></p> <p>Is waste treated in a RCRA 264/265 exempt unit(s) (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?</p> <p>Yes <u>X</u> No ____</p> <p>List types of waste treatment units and processes:</p> <table border="0"> <thead> <tr> <th><u>Waste Code</u></th> <th><u>Type of Treatment</u></th> <th><u>Treatment Units and Processes</u></th> </tr> </thead> <tbody> <tr> <td>K046, F006-09 D008</td> <td>WWTP</td> <td>WWTP</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table> <p>Are treatment residuals generated from these units?</p> <p>Yes <u>X</u> No ____</p>	<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>	K046, F006-09 D008	WWTP	WWTP	_____	_____	_____	_____	_____	_____				
<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>																	
K046, F006-09 D008	WWTP	WWTP																	
_____	_____	_____																	
_____	_____	_____																	



Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>If yes, the residues are subject to the LDR generator requirements.</p> <p>Are these residuals further treated, stored for greater than Section 722.134(a) allows or disposed on-site?</p> <p>Yes _____ No <u>X</u></p> <p>If yes, the TSD checklist must be completed.</p> <p><b>Section 728.150 - Prohibitions on Storage of Restricted Wastes</b></p> <p>Are restricted wastes stored (greater than 90 days) on-site?</p> <p>Yes _____ No <u>X</u></p> <p>If yes, are all containers:</p> <p>2) clearly marked to identify their contents and the date entering storage?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>Are all tanks:</p> <p>2) clearly marked with a description of their contents, the quantity of wastes received, and date entering storage, or is such information recorded and maintained in the operating record?</p> <p>Yes _____ No _____ N/A <u>X</u></p>				<p>At the time of the inspection no waste was over one year. However 1 drum of Hy Cont Ammo was dated 12/13/91. Olin was advised and stated they would comply</p>

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Have wastes been stored for more than one year since applicable LDR regulations went into effect?</p> <p>Yes ____ No <input checked="" type="checkbox"/> N/A ____</p> <p>If yes, can the facility show that such storage is necessary to facilitate proper recovery, treatment or disposal?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>If yes, state how: _____</p> <p>_____</p> <p>_____</p> <p><b>NOTE: Wastes that are the subject of a no-migration petition, a nationwide variance, a case-by-case extension or meet the treatment standards are not subject to the requirements of Section 728.150.</b></p> <p>Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:</p> <p>In a facility meeting the TSCA criteria in 40 CFR 761.65(b)?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p> <p>More than one year?</p> <p>Yes ____ No ____ N/A <input checked="" type="checkbox"/></p>				See previous page.

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.								
				YES	NO										
			<p><b>Section 728.107 - Waste Analysis</b></p> <p>1) Does the facility treat restricted wastes other than in surface impoundments?</p> <p>Yes <u>X</u> No <u>    </u> (If no, go to 728.104 - Surface Impoundments)</p> <p>Describe the waste codes and treatment processes:</p> <table border="0"> <tr> <td><u>Waste Code</u></td> <td><u>Treatment Processes</u></td> </tr> <tr> <td><u>0008 + 0006</u></td> <td><u>Treatment in tank with</u></td> </tr> <tr> <td><u>                    </u></td> <td><u>super triple phosphate to render</u></td> </tr> <tr> <td><u>                    </u></td> <td><u>non-haz.</u></td> </tr> </table> <p>Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes?</p> <p>Yes <u>X</u> No <u>    </u></p> <p>Have treatment standards or prohibition levels been met?</p> <p>Yes <u>X</u> No <u>    </u></p> <p>NOTE: Treatment standards may be expressed as concentrations in the waste (728.107(b)(3)), concentrations in the waste extract (728.107(b)(1)) or combination of both (See Attachment B).</p> <p>2) Does the facility test the treatment residues in accordance with the requirements of Section 728.132(j) (Test methods for California List Wastes)?</p> <p>Yes <u>    </u> No <u>    </u></p>	<u>Waste Code</u>	<u>Treatment Processes</u>	<u>0008 + 0006</u>	<u>Treatment in tank with</u>	<u>                    </u>	<u>super triple phosphate to render</u>	<u>                    </u>	<u>non-haz.</u>				<p><i>Incinerator Ash is treated with triple super phosphate to bind 0008 + 0006 and render waste non Haz per TCLP.</i></p>
<u>Waste Code</u>	<u>Treatment Processes</u>														
<u>0008 + 0006</u>	<u>Treatment in tank with</u>														
<u>                    </u>	<u>super triple phosphate to render</u>														
<u>                    </u>	<u>non-haz.</u>														

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>Does the facility ship any waste or treatment residue to an off-site disposal facility?</p> <p>Yes <u>X</u> No <u>    </u></p> <p>If yes, does the treatment facility provide notification and certification to the disposal facility?</p> <p>Yes <u>X</u> No <u>    </u></p> <p>4) Does the notification contain the following?</p> <p>EPA Hazardous Waste Number(s)      Yes <u>X</u> No <u>    </u></p> <p>Applicable treatment standards and prohibition levels      Yes <u>X</u> No <u>    </u></p> <p>Manifest Number      Yes <u>X</u> No <u>    </u></p> <p>Waste Analysis Data (if available)      Yes <u>X</u> No <u>    </u></p> <p>5) Did the treatment facility submit a certification with each shipment of waste or treatment residue to the land disposal facility stating that the waste or treatment residue has been treated in compliance with the treatment standards specified in Subpart D and the prohibitions set forth in Section 728.132?</p> <p>Yes <u>X</u> No <u>    </u></p> <p>NOTE: Treatment standards may be expressed as a technology or concentration in waste or waste extract. Refer to 728.107(b)(5) for the type of certification required.</p>				

Area	Class	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
				YES	NO		
			<p>6) If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements of 728.107(a)(1)?</p> <p>Yes ____ No ____ <i>n/a</i> <del>X</del></p> <p><u>(NOTE TO ALL INSPECTORS: The May 8, 1990 deadline for the establishment of treatment standards for all Third Third wastes has been extended until August 8, 1990).</u></p>				

OLIN CORP. E. ALTON, IL 62024  
RCRA TSDF DAILY INSPECTION REPORT  
SITE: 1-1 BULLET PLATING FACILITY  
CYANIDE DESTRUCT SYSTEM

SITE LOCATION: INSIDE OF BLDG. 115, ZONE 1

DATE & YEAR OF INSPECTION: DEC 07 1992

TIME: 8 AM

INSPECTOR'S NAME: HOU

INSPECTOR'S SIGNATURE: Durane R Hall

HAZARDOUS WASTE TREATED: CYANIDE CONTAINING WASTE FROM PLATING OPERATIONS

OPERATING REQUIREMENTS

ARE THERE ANY SIGNS OF DETERIORATION, CORROSION, OR LEAKAGE FROM THE:

- A. CYANIDE DESTRUCT TANK? NO SCRAP CYANIDE TREATMENT TANK? NO
- B. PIPING BETWEEN THE CYANIDE SUMP AND THE CYANIDE DESTRUCT TANK? NO
- C. PIPING THAT DISCHARGES FROM THE DESTRUCT TANK INTO THE IN-GROUND SETTLING PIT OUTSIDE OF THE BUILDING? NO
- D. CONCRETE CONTAINMENT STRUCTURE SURROUNDING THE CYANIDE DESTRUCT TANK? NO
- E. IN-GROUND SETTLING PIT IMMEDIATELY DOWNSTREAM FROM CYANIDE DESTRUCT TANK? NO

IS THE CYANIDE SUMP PUMP FUNCTIONING PROPERLY? NO - LOCKED-UP

IS THE WASTE-FEED CUT-OFF SWITCH FOR THE CYANIDE SUMP PUMP WORKING PROPERLY? YES

ARE THE ORP METERS FUNCTIONING PROPERLY? YES

IS THE PH METER FUNCTIONING PROPERLY? YES

IS THE STRIP-CHART RECORDER FUNCTIONING PROPERLY? YES

IS THE HIGH LEVEL ALARM FOR THE CYANIDE DESTRUCT TANK WORKING PROPERLY? YES

IS THE "DANGER-UNAUTHORIZED PERSONNEL KEEP OUT" SIGN POSTED? YES

HAS ANY REMEDIAL ACTION BEEN TAKEN AT THIS SITE SINCE THE LAST INSPECTION? NO

LIST OF CORRECTIVE ACTIONS TAKEN: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

DATE REVISED: 4/23/90

OLIN CORP. E. ALTON, IL 62024  
RCRA TSDF DAILY INSPECTION REPORT  
SITE: 1-1 BULLET PLATING FACILITY  
CYANIDE DESTRUCT SYSTEM

SITE LOCATION: INSIDE OF BLDG. 115. ZONE 1

DATE & YEAR OF INSPECTION: DEC 09 1992 TIME: 8:10 AM

INSPECTOR'S NAME: Hall

INSPECTOR'S SIGNATURE: Dwaine R. Hall

HAZARDOUS WASTE TREATED: CYANIDE CONTAINING WASTE FROM PLATING OPERATIONS

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IS THE CYANIDE SUMP PUMP FUNCTIONING PROPERLY? YES

IS THE WASTE-FEED CUT-OFF SWITCH FOR THE CYANIDE SUMP PUMP WORKING PROPERLY? YES

ARE THE ORP METERS FUNCTIONING PROPERLY? YES

IS THE pH METER FUNCTIONING PROPERLY? YES

IS THE STRIP-CHART RECORDER FUNCTIONING PROPERLY? YES

IS THE HIGH LEVEL ALARM FOR THE CYANIDE DESTRUCT TANK WORKING PROPERLY? YES

IS THE "DANGER-UNAUTHORIZED PERSONNEL KEEP OUT" SIGN POSTED? YES

HAS ANY REMEDIAL ACTION BEEN TAKEN AT THIS SITE SINCE THE LAST INSPECTION? NO

LIST OF CORRECTIVE ACTIONS TAKEN: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

DATE REVISED: 4/23/90

OLIN CORP. E. ALTON, IL 62024  
RCRA TSDF DAILY INSPECTION REPORT  
SITE: 1-1 BULLET PLATING FACILITY  
CYANIDE DESTRUCT SYSTEM

SITE LOCATION: INSIDE OF BLDG. 115, ZONE 1

DATE & YEAR OF INSPECTION: DEC 10 1992 TIME: 8AM

INSPECTOR'S NAME: HOLL

INSPECTOR'S SIGNATURE: Deane R Holl

HAZARDOUS WASTE TREATED: CYANIDE CONTAINING WASTE FROM PLATING OPERATIONS

OPERATING REQUIREMENTS

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SETTLING PIT OUTSIDE OF THE BUILDING? NO  
D. CONCRETE CONTAINMENT STRUCTURE SURROUNDING THE CYANIDE DESTRUCT  
TANK? NO  
E. IN-GROUND SETTLING PIT IMMEDIATELY DOWNSTREAM FROM CYANIDE DESTRUCT  
TANK? NO

IS THE CYANIDE SUMP PUMP FUNCTIONING PROPERLY? YES

IS THE WASTE-FEED CUT-OFF SWITCH FOR THE CYANIDE SUMP PUMP WORKING  
PROPERLY? YES

ARE THE ORP METERS FUNCTIONING PROPERLY? YES

IS THE pH METER FUNCTIONING PROPERLY? YES

IS THE STRIP-CHART RECORDER FUNCTIONING PROPERLY? YES

IS THE HIGH LEVEL ALARM FOR THE CYANIDE DESTRUCT TANK WORKING PROPERLY? YES

IS THE "DANGER-UNAUTHORIZED PERSONNEL KEEP OUT" SIGN POSTED? YES

HAS ANY REMEDIAL ACTION BEEN TAKEN AT THIS SITE SINCE THE LAST  
INSPECTION? NO

LIST OF CORRECTIVE ACTIONS TAKEN: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

DATE REVISED: 4/23/90



OLIN CORP. E. ALTON, IL 62024  
RCRA TSDF DAILY INSPECTION REPORT  
SITE: 1-1 BULLET PLATING FACILITY  
CYANIDE DESTRUCT SYSTEM

SITE LOCATION: INSIDE OF BLDG. 115, ZONE 1

DATE & YEAR OF INSPECTION: DEC 11 1992 TIME: 8:00 AM

INSPECTOR'S NAME: Hall

INSPECTOR'S SIGNATURE: Duane A Hall

HAZARDOUS WASTE TREATED: CYANIDE CONTAINING WASTE FROM PLATING OPERATIONS

OPERATING REQUIREMENTS

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LIST OF CORRECTIVE ACTIONS TAKEN: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

DATE REVISED: 4/23/90